

IN THE CIRCUIT COURT OF THE  
TWENTIETH JUDICIAL CIRCUIT ST. CLAIR  
COUNTY, ILLINOIS

JUDY FAHRNER, individually, and on behalf of all  
others similarly situated

) Case No.: 12C 354

Plaintiffs,

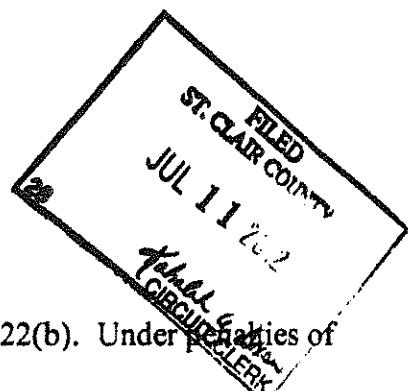
v.

RAYMOND BITAR; NELSON BURTNICK;  
FULL TILT POKER, LTD; TILTWARE, LLC;  
VANTAGE, LTD; FILCO, LTD.; KOLYMA CORP.  
A.V.V.; POCKET KINGS LTD.;  
POCKET KINGS CONSULTING LTD.;  
RANSTON LTD.; MAIL MEDIA LTD.;  
HOWARD LEDERER; PHILLIP IVEY JR.;  
CHRISTOPHER FERGUSON; JOHNSON  
JUANDA; JENNIFER HARMON-TRANIETTO;  
PHILLIP GORDON; ERICK LINDGREN; ERIK  
SEIDEL; ANDREW BLOCH; MIKE MATUSOW;  
GUS HANSEN; ALLEN CUNNINGHAM; PATRIK  
ANTONIUS and RAFAEL FURST,

Defendants.

) CLASS ACTION COMPLAINT

) JURY TRIAL DEMAND

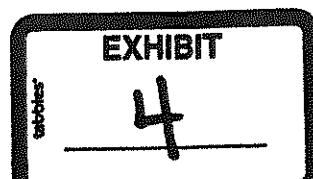


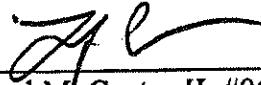
AFFIDAVIT

This affidavit is made pursuant to Supreme Court Rule 222(b). Under penalties of perjury as provided by §1-109 of the Code of Civil Procedure, the undersigned certifies that the money damages sought by the plaintiffs herein does exceed \$50,000.00.

Respectfully submitted,

Dated: July 11, 2012



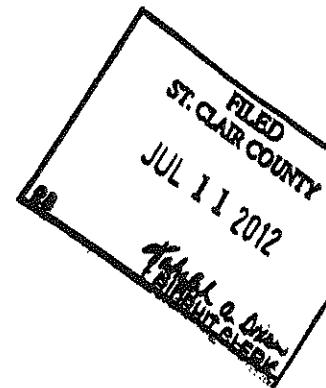


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JUDY FAHRNER, individually, and on behalf of all others similarly situated )  
Plaintiffs, )  
v. )  
RAYMOND BITAR; NELSON BURTNICK; ) CLASS ACTION COMPLAINT  
FULL TILT POKER, LTD; TILTWARE, LLC; )  
VANTAGE, LTD; FILCO, LTD.; KOLYMA CORP. )  
A.V.V.; POCKET KINGS LTD.; )  
POCKET KINGS CONSULTING LTD.; )  
RANSTON LTD.; MAIL MEDIA LTD.; )  
HOWARD LEDERER; PHILLIP IVEY JR.; ) JURY TRIAL DEMAND  
CHRISTOPHER FERGUSON; JOHNSON )  
JUANDA; JENNIFER HARMON-TRANILO; )  
PHILLIP GORDON; ERICK LINDGREN; ERIK )  
SEIDEL; ANDREW BLOCH; MIKE MATUSOW; )  
GUS HANSEN; ALLEN CUNNINGHAM; PATRIK )  
ANTONIUS and RAFAEL FURST, )  
Defendants. )



CLASS ACTION COMPLAINT

NOW COMES Plaintiff, JUDY FAHRNER, individually, and on behalf of all others similarly situated, by and through her attorney, Lloyd M. Cueto, and brings this action as a class action pursuant to 735 ILCS 5/2-801, *et seq.*, and alleges as follows:

NATURE OF ACTION

1. JUDY FAHRNER, individually, and on behalf of others similarly situated (the "Class"), brings this action against RAYMOND BITAR; NELSON BURTNICK; FULL TILT

POKER, LTD; TILTWARE, LLC; VANTAGE, LTD; FILCO, LTD.; KOLYMA CORP. A.V.V.; POCKET KINGS LTD.; POCKET KINGS CONSULTING LTD.; RANSTON LTD.; MAIL MEDIA LTD.; HOWARD LEDERER; PHILLIP IVEY JR.; CHRISTOPHER FERGUSON; JOHNSON JUANDA; JENNIFER HARMON-TRANIELLO; PHILLIP GORDON; ERICK LINDGREN; ERIK SEIDEL; ANDREW BLOCH; MIKE MATUSOW; GUS HANSEN; ALLEN CUNNINGHAM AND PATRIK ANTONIUS ("Defendants"), for claims relating to the marketing, promotion, advertising, transacting, maintaining, engaging and perpetuating of an illegal gambling enterprise, collectively known as "Full Tilt Poker". Through their illegal acts, Defendants knowingly and intentionally accepted gambling losses in violation 720 ILCS 5/28-8.

**PARTIES**

2. Plaintiff, JUDY FAHRNER, is and at all times relevant to this action was, a resident of St. Clair County, Illinois. JUDY FAHRNER is a party of interest in this controversy pursuant to 720 ILCS 5/28-8 (b) not only because she is "any person" within the definition of Section 28-8(b) but because she is and was at all times relevant directly related to and impacted by someone who lost money gambling on Full Tilt Poker.

3. This is a Class Action for money damages. Pursuant to 720 ILCS 5/28-8, Plaintiff, acting individually and on behalf of all others similarly situated, is the proper party to initiate this civil action.

4. Plaintiff seeks class certification pursuant to 735 ILCS 5/2-801, *et seq.*

A. Plaintiffs are Illinois residents and persons qualified under 720 ILCS 5/28-8 to prosecute a civil suit against Full Tilt Poker concerning its illegal internet gambling operation and the recovery of losses related to said operation.

- B. Named Plaintiff, Judy Fahrner, represents a state-wide class of Illinois residents closely related to gambling losers entitled to recover in a civil action as defined by 720 ILCS 5/28-8.
  - C. Plaintiffs bring suit to demand return of gambling losses, and for other such recovery as required by 720 ILCS 5/28-8.
5. Defendant Companies, along with the Individual Defendants (all owners, directors, and officers or principals of the Defendant Companies) and outsiders, associated with each other in the form of an Enterprise (“Enterprise”) to accomplish a common purpose: engage and perpetrate illegal gambling activities to channel Illinois residents’ funds into Full Tilt Poker.
6. **Defendant Raymond Bitar** (“Bitar”) is an individual residing in the State of California. Bitar is – and at all or some relevant time(s) was – a shareholder and director of Full Tilt and/or one or more Full Tilt Companies. Bitar is and/or was CEO of Tiltware LLC since its founding in 2003 and Bitar is one of only two managing members of Tiltware LLC. At all times relevant to this Complaint, Bitar was a founder, owner, and principal decision-maker for Full Tilt Poker, an internet poker company founded in or about 2004 with headquarters in Ireland. At various times relevant to this Complaint, Full Tilt Poker did business through several privately held corporations and other entities, including but not limited to Tiltware, LLC, Kolyma Corporation A.V.V., Pocket Kings Ltd., Pocket Kings Consulting Ltd., Filco Ltd., Vantage Ltd., Ranson Ltd., Mail Media Ltd., and Full Tilt Poker Ltd. (collectively, “Full Tilt Poker”). As of March 2011, Full Tilt Poker was the second-largest poker operator offering gambling on poker games to Untied States residents. Bitar most likely played poker against Illinois residents online through Full Tilt Poker.
7. **Defendant Howard Lederer** (“Lederer”) is an individual residing in the State of Nevada and a member of the Enterprise. Lederer is – and at all relevant times was – a shareholder and director of, and/or a participant in, Full Tilt and/or one or more Full Tilt

Companies. Lederer is a founder of the Full Tilt Poker site and brand and, a professional poker player himself, is a member of Team Full Tilt. As a member of the Team, Lederer represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. At all times relevant, Lederer was the president of Full Tilt Poker and a managing member of Tiltware LLC with Bitar. Lederer most likely played poker against Illinois residents online through Full Tilt Poker.

8. **Defendant Christopher Ferguson** (“Ferguson”) is an individual residing in the State of California and a member of the Enterprise. Ferguson is and has been, at all or some relevant time(s), a shareholder and director of, and/or a participant in, Full Tilt and/or one of more Full Tilt Companies. Ferguson is a founder of the Full Tilt site and brand and, a professional poker player himself, is a member of Team Full Tilt. As a member of the Team, Ferguson represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. At all times relevant, Ferguson was Chairman of the Board of Directors of Tiltware LLC. Ferguson most likely played poker against Illinois residents online through Full Tilt Poker.

9. **Defendant Rafael Furst** (“Furst”) is an individual residing in the State of California and a member of the Enterprise. Furst is and has been, at all or some relevant time(s), a shareholder and director of, and/or a participant in, Full Tilt and/or one of more Full Tilt Companies. Furst is a founder of the Full Tilt site and brand and, a professional poker player himself, is a member of Team Full Tilt. As a member of the Team, Furst represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. At all times relevant, Furst was on the Board of

Directors of Tiltware LLC. Furst most likely played poker against Illinois residents online through Full Tilt Poker.

10. **Defendant Nelson Burtnick** (“Burtnick”) is an individual residing in Ireland, and is and/or was, starting in 2009, an employee of Full Tilt Poker Ltd. and the head of the payment processing department for Full Tile (and/or its Member Companies). Burtnick has directed or otherwise participated in the conduct of the Full Tilt Company affairs, especially with respect to payment processing activity.

11. **Defendant Full Tilt Poker Ltd.** is the corporate person with which the members of the Full Tilt Team have contracted.

12. **Defendant Tiltware LLC** (“Tiltware”) is a corporate person and the exclusive poker software developer and licensor for Full Tilt. Tiltware is also the Full Tilt market wing, and is headquartered and registered at all relevant time(s) in California. Tiltware has participated in and/or directed Full Tilt Poker and its illegal acts. Tiltware is the parent company of Pocket Kings Ltd., Pocket Kings Consulting Ltd., Filco Ltd., and other Full Tilt Companies. Individual Defendants owned the following approximate percentages of Tiltware: Bitar (7.8%), Lederer (8.6%), Ferguson (19.2%) and Furst (2.6%). At all times relevant, said individual Defendants comprised the Board of Directors of Tiltware.

13. **Defendant Vantage, Ltd.** (“Vantage”), is a corporate person registered in Alderney, in the Channel Islands, with which users of the Full Tilt website, including specifically, “persons situated in North America,” enter into an “End User License Agreement.” That Agreement states: “Adult users of all skill levels who are situated in North America can download the propriety gaming software needed to participate in poker tournaments and to play online interactive games of poker for real money at [www.FullTiltPoker.com](http://www.FullTiltPoker.com).” Vantage has participated

in and/or directed Full Tilt Poker and its illegal acts. Vantage is licensed, on behalf of Full Tilt, to register new customers, accept deposits from new and existing customers, permit withdrawal of funds by existing customers and permit participation by customers in gambling transactions and game play.

**14. Defendant Filco Ltd.** (“Filco”), is a corporate person that holds or held, at all or some relevant time(s), the “eGambling” license issued by the Alderney Gambling Control Commission. Filco has participated in and/or directed Full Tilt Poker and its illegal acts. Filco is explicitly named in Pocket Kings Ltd. documents as a related company to Pocket Kings Ltd., among others, and Filco’s corporate parent is Tiltware. As a licensee of the Alderney Gambling Control Commission, Filco is licensed, on behalf of Full Tilt Poker, to register new customers, accept deposits from new and existing customers, permit withdrawal of funds by existing customers and permit participation by customers in gambling transactions and game play.

**15. Defendant Kolyma Corporation A.V.V.** (“Koyma”) is a corporate person and an Aruban financial services limited liability company. Kolyma has participated in and/or directed Full Tilt Poker and its illegal acts. Kolyma is the legal owner of the Full Tilt website.

**16. Defendant Pocket Kings Ltd.** (“Pocket Kings”), is a corporate person, headquartered in Ireland, and is responsible for “operating” the Full Tilt website. Pocket Kings has at all or some relevant time(s) provided “[t]echnology and [m]arketing consulting services to the online poker industry and one of the fastest growing poker sites, Full Tilt Poker.” Pocket Kings is a member of the Enterprise and has participated in and/or directed Full tilt Poker and its illegal acts. Pocket Kings’ parent company is Tiltware. Pocket Kings is a “related company” to, *inter alia*, Filco Ltd., Pocket Kings Consulting Ltd., and a BVI incorporated company called My West Nook Limited.

17. **Defendant Pocket Kings Consulting Ltd.** (“Pocket Kings Consulting”), is a corporate person headquartered in Ireland. Pocket Kings Consulting is a related company to Pocket Kings, Filco, and My West Nook Limited. Pocket Kings Consulting is the exclusive consultant to Full Tilt Poker.

18. **Defendant Ranston Ltd.** (“Ranston”) is a corporate person in whose name Full Tilt Poker funds are held in Switzerland. Ranston is a member of the Enterprise and has participated in and/or directed the conduct of Full Tilt Poker in aid of its illegal acts.

19. **Defendant Mail Media Ltd.** (“Mail Media”) is a corporate person in whose name Full Tilt Funds are held in Switzerland. Mail Media is a member of the Enterprise and has participated in and/or directed the conduct of Full Tilt Poker in aid of its illegal acts.

20. **Defendant Philip Ivey Jr.** (“Ivey”) is an individual residing in the State of Nevada and a member of the Enterprise. Ivey is – and at all relevant times was – a shareholder and director of, and/or a participant in, Full Tilt and/or one or more Full Tilt Companies. Ivey is a founder of the Full Tilt Poker side and brand and, a professional poker player himself, is a member of Team Full Tilt. As a member of the Team, Ivy represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. Ivey is said to hold at least a 5% stake in the Full Tilt venture. Ivey most likely played poker against Illinois residents online through Full Tilt Poker.

21. **Defendant Johnson Juanda** (“Juanda”) is an individual residing in the State of California, and is a member of the Enterprise. At all or some relevant time(s), Juanda has been a shareholder and director of, and/or a participant in, Full Tilt and/or one or more Full Tilt Companies. Juanda, a professional poker player himself, is a member of Team Full Tilt. As a member of the Team, Juanda represents the Full Tilt brand in poker-related events all over the

world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. Juanda most likely played poker against Illinois residents online through Full Tilt Poker.

22. **Defendant Jennifer Harman-Traniello** (“Harman”) is an individual residing in the State of Nevada and is a member of the Enterprise. At all or some relevant time(s), Harman has been a shareholder and director of Full Tilt and/or one or more Full Tilt Companies. Harman, a professional poker player himself, is a member of Team Full Tilt and represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. Harman most likely played poker against Illinois residents online through Full Tilt Poker.

23. **Defendant Phillip Gordon** (“Gordon”) is an individual residing in the State of Washington, and is a member of the Enterprise. At all or some relevant time(s), Gordon has been a shareholder and director of Full Tilt and/or one or more Full Tilt Companies. Gordon, a professional poker player himself, is a member of Team Full Tilt and represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. Gordon most likely played poker against Illinois residents online through Full Tilt Poker.

24. **Defendant Erick Lindgren** (“Lindgren”) is an individual residing in the State of Nevada, and is a member of the Full Tilt Enterprise. At all or some relevant time(s), Lindgren has been a shareholder and director of Full Tilt and/or one or more Full Tilt Companies. Lindgren, a professional poker player himself, is a member of Team Full Tilt and represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. Lindgren most likely played poker against Illinois residents online through Full Tilt Poker.

25. **Defendant Erik Seidel** (“Seidel”) is an individual residing in the State of Nevada, and is a member of the Enterprise. At all or some relevant time(s), Seidel has been a shareholder and director of Full Tilt and/or one or more Full Tilt Companies. Seidel, a professional poker player himself, is a member of Team Full Tilt and represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. Seidel most likely played poker against Illinois residents online through Full Tilt Poker.

26. **Defendant Andrew Bloch** (“Bloch”) is an individual residing in the State of Nevada, and is a member of the Enterprise. At all or some relevant time(s), Bloch has been a shareholder and director of Full Tilt and/or one or more Full Tilt Companies. Bloch, a professional poker player himself, is a member of Team Full Tilt and represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. Bloch most likely played poker against Illinois residents online through Full Tilt Poker.

27. **Defendant Mike Matusow** (“Matusow”) is an individual residing in the State of Nevada, and is a member of the Enterprise. At all or some relevant time(s), Matusow has been a shareholder and director of Full Tilt and/or one or more Full Tilt Companies. Matusow, a professional poker player himself, is a member of Team Full Tilt and represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. Matusow most likely played poker against Illinois residents online through Full Tilt Poker.

28. **Defendant Gus Hansen** (“Hansen”) is an individual residing in the Kingdom of Denmark, and is a member of the Enterprise. At all or some relevant time(s), Hansen has been a

shareholder and director of Full Tilt and/or one or more Full Tilt Companies. Hansen, a professional poker player himself, is a member of Team Full Tilt and represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. Hansen most likely played poker against Illinois residents online through Full Tilt Poker.

29. **Defendant Allen Cunningham** (“Cunningham”) is an individual residing in the State of California, and is a member of the Enterprise. At all or some relevant time(s), Cunningham has been a shareholder and director of Full Tilt and/or one or more Full Tilt Companies. Cunningham, a professional poker player himself, is a member of Team Full Tilt and represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. Cunningham most likely played poker against Illinois residents online through Full Tilt Poker.

30. **Defendant Patrik Antonius** (“Antonius”) is an individual residing in the Republic of Finland, and is a member of the Enterprise. At all or some relevant time(s), Antonius has been a shareholder and director of Full Tilt and/or one or more Full Tilt Companies. Antonius, a professional poker player himself, is a member of Team Full Tilt and represents the Full Tilt brand in poker-related events all over the world, wearing clothing and accessories that bear the easily recognizable Full Tilt Poker patch. Antonius most likely played poker against Illinois residents online through Full Tilt Poker.

#### **CLASS ACTION ALLEGATIONS**

31. Plaintiffs bring this action as a class pursuant to 735 ILCS 5/2-801.

a. *Numerosity.* The members of the Class are so numerous that joinder of all members is impracticable. While the exact number of Class members is unknown to Plaintiff at

this time, and can only be ascertained through appropriate discovery, Plaintiffs believe that there are hundreds of thousands – possibly millions – of Illinois poker players who lost money to Full Tilt on or before April 15<sup>th</sup>, 2011 and whose close relatives are entitled to tripled recovery of said losses in accordance with 720 ILCS 5/28-8.

b. *Commonality*. Common questions of law and fact exist as to all members of the Class and predominate over any questions affecting solely individual members of the Class. Among the questions of law and fact common to the Class are:

- A. Whether an illegal gambling enterprise existed in violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8.;
- B. Whether Defendants were each employed by or associated with the enterprise;
- C. Whether Defendants participated in the conduct or affairs of the enterprise;
- D. Whether injuries to Plaintiff were sustained by reason of the Defendants' activities in violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8.

c. *Typicality*. Plaintiff's claims are typical of the claims of the members of the Class because close relatives of Illinois residents who lost money gambling through Full Tilt Poker are entitled to tripled recovery pursuant to Section 28-8(b).

d. *Adequacy*. Plaintiffs will fairly and adequately protect the interests of the members of the Class and has retained counsel competent and experienced in class actions and complex civil litigation. Plaintiffs have no interests antagonistic to or in conflict with those of the Class.

32. Class action status in this action is warranted because prosecution of separate actions by members of the Class would create a risk of adjudications with respect to individual members of the Class which would, as a practical manner, be dispositive of the interests of the other

members not parties to the actions, or substantially impair or impede their ability to protect their interests.

33. Class action status is also warranted because prosecution of separate actions by members of the Class would create a risk of establishing incompatible standards of conduct for defendants, and questions of law or fact common to members of the Class predominate over any questions affecting only individual members, and a class action is superior to the other available methods for the fair and efficient adjudication of this controversy.

#### **JURISDICTION AND VENUE**

34. Subject Matter Jurisdiction. This Court has jurisdiction over this action pursuant to 720 ILCS 5/28-8 and 720 ILCS 5/28-1.

35. Personal Jurisdiction. This Court has personal jurisdiction over the Defendants because all Defendants, through their conduct and participation with the Enterprise, have done significant and continuous business in the State of Illinois.

36. Named Plaintiff, and those plaintiffs defined in the class are residents of the State of Illinois. These plaintiffs sustained their injuries in the State of Illinois.

37. Venue. Venue is proper in this Circuit because there is no other circuit in which every defendant can be found, and because there is no single identifiable district in which a substantial part of the relevant events can be said to have 'occurred' or where a substantial part of the property that gave rise to the action is physically located.

#### **FACTUAL BACKGROUND**

38. Full Tilt is an umbrella undertaking and brand name under which a number of privately held companies and other ventures, the "Full Tilt Companies," do business in the State of Illinois, the United States and internationally.

39. Full Tilt's primary face to Illinois residents has been the Full Tilt Poker internet gambling venture, which includes the online card rooms accessed through the Full Tilt software, which is downloaded from Full Tilt's "real-money" gambling website, "fulltiltpoker.com." The Full Tilt Poker internet gambling venture is a product that was launched, directed, and managed, in part, by members of the Enterprise working in concert.

40. Full Tilt also maintained an aggressive marketing team that promoted Full Tilt in the State of Illinois and elsewhere. Full Tilt sponsored certain high-stakes gambling events around the world; sponsored the Full Tilt Team; partnered with ESPN to televise certain high-stakes gambling events; produced advertisements for Full Tilt's "play-money" site ([www.fulltiltpoker.net](http://www.fulltiltpoker.net)) that aired on cable television (including the Game Show Network) and were posted on the internet. Full Tilt Team members played high stakes poker games as representatives of Full Tilt, wearing the Full Tilt insignia. These advertisements were specifically directed to poker players. When Full Tilt's marketing efforts were successful, they induced gamblers to navigate to Full Tilt's website and open an account there. Full Tilt deliberately established contacts with gamblers in Illinois and derived revenue from gamblers in Illinois because it intended to keep or grow its stake in the Illinois internet poker market.

41. Full Tilt's direct commercial contacts with Illinois residents include:

- accepting gambling losses from Illinois residents;
- soliciting players through internet advertisements and links;
- buying advertisements on television programs that are readily accessible to residents of Illinois;
- sponsoring high-stakes games (and ESPN poker programming) televised to residents of Illinois;

- obtaining contact and personal information, including bank account information, from Illinois residents through the internet;
- entering into a contract with internet gamblers from Illinois regarding the Full Tilt software that real money and play-money players downloaded;
- maintaining player accounts for all Illinois resident players and providing access to those accounts through the internet;
- sponsoring poker celebrities, including the Individual Defendants, to play (in person) for the Full Tilt brand and wear Full Tilt patches in televised games shown in Illinois.

42. There were a number of companies and individuals working within the Full Tilt outfit – all agents, representatives, directors, owners, officers and/or principals of the Full Tilt outfit – that were joined together for the purpose of obtaining and processing players' funds. The entities in the Enterprise shared the common purposes of maintaining Full Tilt's position in the market by enabling and participating in transactions with Illinois residents.

43. Full Tilt Companies that formed the Enterprise include, but are not limited to, the following groups:

A. The Full Tilt Team of professional poker players who own and, in part, direct, the Full Tilt Enterprise;

B. Tiltware, the exclusive poker software developer and licensor for the Enterprise, and the Enterprise's marketing wing, headquartered and registered, at all or some relevant time(s) in California;

C. Vantage, the corporate entity registered in Alderney, in the Channel Islands, with which users of the Full Tilt Poker website, including specifically, "persons situated in North

America," enter into an "End User License Agreement." That Agreement states: "Adult users of all skill levels who are situated in North America can download the proprietary gaming software needed to participate in poker tournaments and to play online interactive games of poker for real money at [www.FullTiltPoker.com](http://www.FullTiltPoker.com)." Funds are also held, in a Swiss bank in Vantage's name;

D. Filco, the corporate entity that holds or held, at all or some relevant time(s) the "eGambling" license issued by the Alderney Gambling Control Commission;

E. Kolyma, the Aruban financial services limited liability company that is eligible for exemptions from profit and dividend withholding tax, subject to limitations;

F. Pocket Kings, the Irish company which "operates" the Full Tilt Poker site. Pocket Kings has, at all or some relevant time(s) provided "[t]echnology and [m]arketing consulting services to the online poker industry and one of the fastest growing poker sites, Full Tilt Poker";

G. Pocket Kings Consulting;

H. Ranston, the entity in whose name certain Full Tilt funds are held in Switzerland;

I. Mail Media, the entity in whose name certain Full Tilt funds are held in Switzerland;

J. Full Tilt Poker Ltd., an apparent alternate name or entity associated with the Enterprise.

44. Each of the above-named entities is or was a member of the Full Tilt Enterprise at a time or times relevant to this Complaint.

45. Profits from the Full Tilt Poker website, player deposits, gambling losses, licensing fees, agreements, merchandise sales, and other Full Tilt Poker ventures, were distributed amongst the Defendants.

46. Illinois residents, during all relevant times, have been targeted by the Full Tilt marketing campaigns, have navigated to the Full Tilt website, have opened accounts deposited their own funds into those accounts, played “real money” poker using the Full Tilt Poker product and lost money to Defendants.

47. On April 15, 2011, the card rooms were shut down by the Department of Justice. Individuals associated with the Enterprise were charged by the U.S. Attorney for the Southern District of New York in a criminal indictment which alleged wire fraud, bank fraud, money laundering and operating in violation of State and Federal Laws. Defendants Bitar, Lederer, Ferguson and Furst are among the named criminal defendants in that action. Full Tilt and associated entities are named as defendants in a companion civil action, also filed by the US Attorney for the Southern District of New York. In connection with these pending actions, the Department of Justice has seized and sought the forfeiture of Full Tilt assets, including its domain name, several of its bank accounts, and profits. The department of justice has not sought forfeiture of U.S. player funds.

48. On or about April 15, 2011, the U.S. Attorney for the Southern District of New York seized the assets of the internet poker companies operating illegally in the United States, one of which was “Full Tilt Poker”. Arrest warrants were issued for certain founders of these companies for, among other offenses, money laundering, conspiracy to commit wire fraud, and conspiracy to commit bank fraud. The Department of Justice also filed a civil suit for in rem

forfeiture of all assets and proceeds derived from the illegal acts in which these companies allegedly engaged.

49. On April 15<sup>th</sup>, and at all relevant times prior, hundreds of thousands – if not millions – of Illinois residents held personal funds in individual, “secure” accounts with Full Tilt Poker. Until April 15<sup>th</sup>, customers regularly engaged in internet poker games for real-money, on the Full Tilt website, using Full Tilt software, and drawing on their Full Tilt accounts.

50. At all or some relevant time(s) between November 2006 and April of 2011, Defendants joined together to form an illegal gambling enterprise (“Enterprise”) – an association-in-fact which operated under the name of, acted through, and/or held itself out as “Full Tilt.” The Enterprise achieved that end through illegal means, in particular through violations of 720 ILCS 5/28-1 (et.al.) and 720 ILCS 5/28-8.

51. Illinois residents who played for real-money on the Full Tilt website were required to maintain a Player Account with Full Tilt. Illinois residents deposited their funds into their personal “secure” Player Accounts through a number of methods, including credit and debit card transactions and wire transfers. The deposited funds were fraudulently comingled with Full Tilt’s operational funds and dispersed to individual Defendants. Upon information and belief, Full Tilt’s Board of Directors distributed approximately \$443,860,529.89 to themselves and other owners between April, 2007 and April, 2011. Upon establishing their Player Accounts and depositing a minimum sum into their Player Accounts, Illinois residents were free to play for “real-money” in Full Tilt Poker card rooms with players from all over the world and even with professional poker legends sponsored by Team Full Tilt.

52. Team Full Tilt is composed of elite professional players, sponsored by Full Tilt, who play for and promote the brand in high-stakes events like the internationally televised World

Series of Poker. Team members also directly interact with poker players through the Full Tilt website, wear company gear with the Full Tilt insignia during all professional events, and make public statements to publicize their affiliation with Full Tilt. Perhaps most importantly, all members of the Team own an equity interest in – and are directors of – the Full Tilt and/or the entities that operate under the Full Tilt name.

53. At all relevant times herein, Defendants actions, individually and collectively, violated 720 ILCS 5/28-1, in particular Subsections(a)(1) and (a)(12) which respectively state that a person commits the unlawful act of gambling when he:

Plays a game of chance or skill for money or other thing of value, unless excepted in subsection (b) of this Section; or

Knowingly establishes, maintains, or operates an Internet site that permits a person to play a game of chance or skill for money or other thing of value by means of the Internet or to make a wager upon the result of any game, contest, political nomination, appointment, or election by means of the Internet. This item (12) does not apply to activities referenced in items (6) and (6.1) of subsection (b) of this Section.

**COUNT I**

**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Raymond Bitar)**

54. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

55. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a

"winner" of any moneys lost by such other person in or through any such transactions.

56. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

57. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

58. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

COUNT II

(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Howard Lederer)

59. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

60. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in

the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

61. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

62. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

63. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

COUNT III

(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Christopher Ferguson)

64. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

65. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

66. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

67. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

68. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

COUNT IV

(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Rafael Furst)

69. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

70. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

71. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

72. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

73. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

COUNT V

(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Nelson Burtnick)

74. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

75. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

76. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

77. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

78. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's

perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT VI**

**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Full Tilt Poker, Ltd.)**

79. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

80. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

81. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

82. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

83. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT VII**

**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Tiltware LLC)**

84. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

85. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

86. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not

in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

87. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

88. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT VIII**  
**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Vantage, Ltd.)**

89. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

90. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

91. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

92. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

93. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT IX**

**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Filco, Ltd.)**

94. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

95. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name

of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

96. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

97. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

98. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

COUNT X

(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Kolyma Corporation A.V.V.)

99. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

100. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

101. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

102. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

103. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

COUNT XI

(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Pocket Kings, Ltd.)

104. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

105. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

106. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

107. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

108. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT XII**

**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Pocket Kings Consulting, Ltd.)**

109. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

110. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

111. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

112. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

113. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT XIII**

**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Ranston, Ltd.**

114. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

115. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

116. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

117. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

118. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT XIV**  
**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Mail Media, Ltd.)**

119. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

120. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

121. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not

in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

122. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

123. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT XV**

**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Philip Ivey, Jr.)**

124. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

125. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

126. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

127. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

128. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

COUNT XVI

(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Johnson Juanda)

134. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

135. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name

of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

136. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

137. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

138. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

COUNT XVII  
(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Jennifer Harman-Traniello)

139. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

140. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

141. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

142. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

143. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

COUNT XIII  
(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Phillip Gordon)

144. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

145. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

146. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

147. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

148. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT XIV**

**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Erick Lindgren)**

149. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

150. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

151. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

152. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

153. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's

perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT XX**

**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Erik Seidel)**

154. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

155. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

156. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

157. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

158. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT XXI**

**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Andrew Bloch)**

164. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

165. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

166. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

167. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

168. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT XXII**  
**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Mike Matusow)**

169. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

170. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

171. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not

in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

172. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

173. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT XXIII**  
**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Gus Hansen)**

174. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

175. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

176. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

177. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

178. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

**COUNT XXIV**  
**(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Allen Cunningham)**

179. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

180. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for

transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

181. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

182. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

183. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

COUNT XXV

(Violation of 720 ILCS 5/28-1 and 720 ILCS 5/28-8 by Defendant Patrik Antonius)

184. Plaintiff re-alleges and incorporated all prior paragraphs of this Complaint into this Count.

185. 720 ILCS 5/28-8(a) states:

Any person who by gambling shall lose to any other person, any sum of money or thing of value, amounting to the sum of \$50 or more shall pay or deliver the same or any part thereof, may sue for and recover the money or other thing of value, so lost and paid or delivered, in a civil action against the winner thereof, with costs, in the circuit court. No person who accepts from another person for transmission, and transmits, either in his own name or in the name of such other person, any order for any transaction to be made upon, or who executes any order given to him by another person, or who executes, shall under any circumstances, be deemed a "winner" of any moneys lost by such other person in or through any such transactions.

186. 720 ILCS 5/28-8(b) further states that:

If within 6 months, such person who under the terms of Subsection 28-8(a) is entitled to initiate action to re-cover his losses does not in fact pursue his remedy, any person may initiate a civil action against the winner. The court of the jury, as the case may be, shall determine the amount of the loss. After such determination, the court shall enter a judgment of triple the amount so determined.

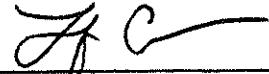
187. The defendant named in this Count individually, and in association with others violated 720 ILCS 5/28-1 and in accordance with 720 ILCS 5/28-8 is liable for tripled the amount of Illinois residents' losses.

188. Plaintiffs' recovery includes but is not limited to the gambling losses of Illinois residents from [4.5 years ago] to [6 months prior to date of filing] resulting from Defendant's perpetuation of an illegal gambling enterprise in violation of 720 ILCS 5/28-1 as well as statutorily prescribed recovery of three times said losses pursuant to 720 ILCS 5/28-8(b).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated respectfully requests this Court enter judgment in favor of Plaintiff and award damages as set forth before and for any other relief the Court deems proper.

Respectfully submitted,

Dated: April 23, 2012

  
\_\_\_\_\_  
Lloyd M. Cueto, IL #06292629  
Law Office of Lloyd M. Cueto  
7110 West Main Street  
Belleville, IL 62223  
Phone: (618) 277-1554  
Fax: (618) 277-0962

ST CLAIR COUNTY  
TWENTIETH CIRCUIT COURT, KAHALAH A. DIXON

RECEIPT #: C 000308472  
RECEIVED OF: CUETO LLOYD A  
PART. ID: 1536  
BY CLERK: MG  
CHECKS: A 1628

DATE: 07-11-2012

TIME: 16:16:18

MEMO:

\$246.00

CASH	CREDIT	CHANGE	OTHER
\$0.00	\$0.00	\$0.00	\$0.00

CASE NUMBER	EVENT	COURT/JUDGE	TAX NO.	AMOUNT
12-L-0354 FAHRNER VS BITAR PARTY: CUETO LLOYD A	2023	PMT:CFIL COMPLAINT FILING FEE		\$246.00
			TOTAL RECEIPT...	\$246.00

- \* CHECK/CHEQUE IS CONDITIONAL PAYMENT
- \* PENDING RECEIPT OF FUNDS FROM BANK. \*

**MASTER RECORD SHEET  
#118**  
**CIRCUIT COURT OF ST. CLAIR COUNTY**

12 C 354

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
Complete 4 if Small Claims Case.  
Sections 3, 5 & 6 For Office use Only.

Case Number

Amount Claimed

\$50,000+

1. JUDY FAHRNER, individually, and on behalf  
of all others similarly situated

RAYMOND BITAR, et al.

VS

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L	Code 01	Nature of Action Law	Code 02
TO THE SHERIFF: SERVE THIS DEFENDANT AT:			
2. Pltf. Atty. Lloyd M. Cueto	Code _____	3. NAME Jonathan Andrew Harris	
Address 7110 West Main Street		Harris, Cutler & Houghteling LLP, (NY) Trinity Building	
City Belleville	Phone 277-1554	ADDRESS 111 Broadway	
Add. Pltf. Atty. _____	Code _____	Suite 402	
Is Personal Injury Involved	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CITY & STATE New York, NY 10006	
Does Pltf. Demand A Jury Trial	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	(THIS DOES NOT CONSTITUTE A JURY DEMAND)	

4.  CHECK FOR Complete This Section For Small Claims  
SMALL CLAIMS SUMMONS

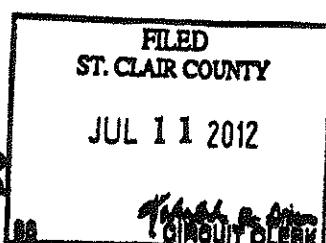
Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
Court Location

5. A. Is an insurance carrier involved?  Yes  No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?  Yes  No

B. If yes, will the appointment of a guardian Ad Litem be necessary  Yes  No



SEE REVERSE FOR

CASE CLASSIFICATIONS AND CODES



**MASTER RECORD SHEET  
#115  
CIRCUIT COURT OF ST. CLAIR COUNTY**

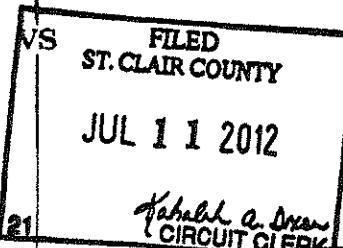
*12-h-354*

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6 Case Number 12-h-354  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

Amount Claimed \$50,000+

1. JUDY FAHRNER, individually, and on behalf  
 of all others similarly situated

RAYMOND BITAR, et al.



Plaintiff(s) 21

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>	Code <u>02</u>
		TO THE SHERIFF: SERVE THIS DEFENDANT AT:	
2. Pltf. Atty. <u>Lloyd M. Cueto</u>		3. NAME <u>Cody Shawn</u>	
Address <u>7110 West Main Street</u>		Harris Keker & Van Nest LLP	
City <u>Belleville</u>		ADDRESS <u>633 Battery Street</u>	
Add. Pltf. Atty. _____			
Is Personal Injury Involved <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Does Pltf. Demand A Jury Trial <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		CITY & STATE <u>San Francisco, NY 94111</u>	
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.  CHECK FOR  
SMALL CLAIMS SUMMONS      Complete This Section For Small Claims  
 Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
 Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?       Yes       No
- B. If yes please give company name: \_\_\_\_\_
6. A. Is there a minor involved?       Yes       No
- B. If yes, will the appointment of a guardian Ad Litem be necessary       Yes       No

**SEE REVERSE FOR**

**CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET  
#120  
CIRCUIT COURT OF ST. CLAIR COUNTY**

12-1-354

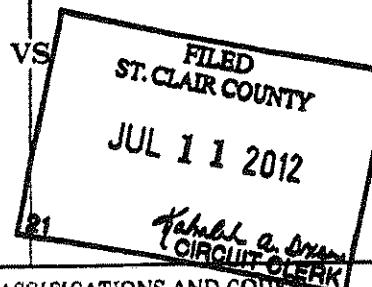
Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

Case Number

Amount Claimed \$50,000+

1. JUDY FAHRNER, individually, and on behalf  
 of all others similarly situated

RAYMOND BITAR, et al.



Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L	Code 01	Nature of Action Law	Code 02
2. Pltf. Atty. Lloyd M. Cueto Address 7110 West Main Street City Belleville Add. Pltf. Atty. _____	Code _____ Phone 277-1554 Code _____	TO THE SHERIFF: SERVE THIS DEFENDANT AT: 3. NAME David Angeli Angeli Law Group LLC ADDRESS 121 SW Morrison Street Suite 400 CITY & STATE Portland, OR 97204	
Is Personal Injury Involved <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Does Pltf. Demand A Jury Trial <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.  CHECK FOR  
 SMALL CLAIMS SUMMONS      Complete This Section For Small Claims

Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
 Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?       Yes       No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?       Yes       No

B. If yes, will the appointment of a guardian Ad Litem be necessary       Yes       No

**SEE REVERSE FOR**

**CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET  
CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6 Case Number 12-C-0357  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

Amount Claimed \$50,000+

1. JUDY FAHRNER, individually, and on behalf  
 of all others similarly situated

RAYMOND BITAR, et al.

VS

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>	Code <u>02</u>
--------------------------------	----------------	-----------------------------	----------------

2. Pltf. Atty. <u>Lloyd M. Cueto</u>	Code _____	TO THE SHERIFF: SERVE THIS DEFENDANT AT:	
Address <u>7110 West Main Street</u>		3. NAME <u>A. Jeff Ifrah</u>	
City <u>Belleview</u>	Phone <u>277-1554</u>	David B. Deltch, IFRAH PLLC	
Add. Pltf. Atty. _____	Code _____	ADDRESS <u>1717 Pennsylvania Avenue</u>	
Is Personal Injury Involved	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Suite <u>650</u>	
Does Pltf. Demand A Jury Trial	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CITY & STATE <u>Washington, D.C. 20006-2004</u>	
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.   CHECK FOR  
 SMALL CLAIMS SUMMONS      Complete This Section For Small Claims

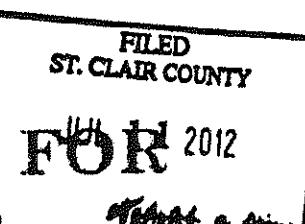
Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
 Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?       Yes       No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?       Yes       No

B. If yes, will the appointment of a guardian Ad Litem be necessary       Yes       No



**SEE REVERSE FOR  
 CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET**  
**CIRCUIT COURT OF ST. CLAIR COUNTY**

#2  
PL 354

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
Complete 4 if Small Claims Case.  
Sections 3, 5 & 6 For Office use Only.

Case Number

Amount Claimed \$50,000+

1. JUDY FAHRNER, individually, and on behalf  
of all others similarly situated

RAYMOND BITAR, et al.

VS

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L	Code 01	Nature of Action Law	Code 02
2. Pltf. Atty. Lloyd M. Cueto	Code _____	TO THE SHERIFF: SERVE THIS DEFENDANT AT:	
Address 7110 West Main Street		3. NAME Titware LLC	
City Belleville	Phone 277-1554	ADDRESS 10866 Wilshire Blvd	
Add. Pltf. Atty. _____	Code _____	Floor 4	
Is Personal Injury Involved	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CITY & STATE Los Angeles, CA 90024-4338	
Does Pltf. Demand A Jury Trial	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.   CHECK FOR  
SMALL CLAIMS SUMMONS      Complete This Section For Small Claims

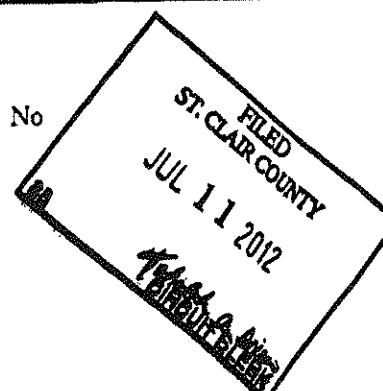
Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?       Yes       No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?       Yes       No

B. If yes, will the appointment of a guardian Ad Litem be necessary       Yes       No



SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES

**MASTER RECORD SHEET**  
**CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf Must Complete Sections 1,2,3,5,&6 Case Number 122358  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

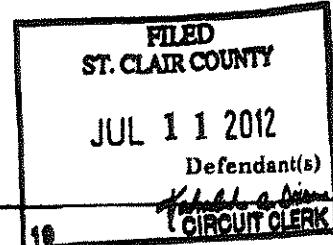
Amount Claimed \$50,000+

1. JUDY FAHRNER, individually, and on behalf  
of all others similarly situated

RAYMOND BITAR, et al.

VS

Plaintiff(s)



(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

10

Code 02

Classification Prefix L	Code 01	Nature of Action Law	Code 02
2. Pltf. Atty. Lloyd M. Cueto	Code _____	TO THE SHERIFF: SERVE THIS DEFENDANT AT:	
Address 7110 West Main Street		3. NAME Elliot Remsen	
City Belleville	Phone 277-1554	Peters Keker & Van Nest, LLP	
Add. Pltf. Atty. _____	Code _____	ADDRESS 710 Sansome Street	
Is Personal Injury Involved	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CITY & STATE San Francisco, CA 94111	
Does Pltf. Demand A Jury Trial	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.  CHECK FOR Complete This Section For Small Claims  
SMALL CLAIMS SUMMONS

Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?  Yes  No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?  Yes  No

B. If yes, will the appointment of a guardian Ad Litem be necessary  Yes  No

**SEE REVERSE FOR**

**CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET  
#124  
CIRCUIT COURT OF ST. CLAIR COUNTY**

124354

Note: Pltf. Atty or Pro Se Pltf Must Complete Sections 1,2,3,5,&6  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

Case Number \_\_\_\_\_

Amount Claimed \$50,000+

1. JUDY FAHRNER, individually, and on behalf  
 of all others similarly situated

RAYMOND BITAR, et al.

VS

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L	Code 01	Nature of Action Law	Code 02
2. Pltf. Atty. Lloyd M. Cuelo	Code _____	TO THE SHERIFF: SERVE THIS DEFENDANT AT:	
Address 7110 West Main Street		3. NAME Paul Colinet	
City Belleville	Phone 277-1554	Harris, Cutler & Houghteling LLP (NY) Trinity Building	
Add. Pltf. Atty. _____	Code _____	ADDRESS 111 Broadway	
Is Personal Injury Involved	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Suite 402	
Does Pltf. Demand A Jury Trial	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CITY & STATE New York, NY 10006	
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4. <input type="checkbox"/> CHECK FOR SMALL CLAIMS SUMMONS		Complete This Section For Small Claims	
Please Set This Case For _____		Court Location	FILED ST. CLAIR COUNTY at _____ M On _____ 20____
A. Is an insurance carrier involved? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		JUL 11 2012	
B. If yes please give company name: _____		19	Kathleen A. Diven CIRCUIT CLERK
6. A. Is there a minor involved? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
B. If yes, will the appointment of a guardian Ad Litem be necessary <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

SEE REVERSE FOR

CASE CLASSIFICATIONS AND CODES



**MASTER RECORD SHEET  
#125  
CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6 Case Number 12C354  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

1. JUDY FAHRNER, individually, and on behalf  
 of all others similarly situated

RAYMOND BITAR, et al.

VS

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L	Code 01	Nature of Action Law	Code 02
2. Pltf. Atty. Lloyd M. Cueto	Code _____	TO THE SHERIFF: SERVE THIS DEFENDANT AT:	
Address 7110 West Main Street		3. NAME Richard Ware Levitt	
City Belleville	Phone 277-1554	Levitt & Kaizer	
Add. Pltf. Atty. _____	Code _____	ADDRESS 40 Fulton Street	
Is Personal Injury Involved	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	FL. 23	
Does Pltf. Demand A Jury Trial	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CITY & STATE New York, NY 10038	
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.   CHECK FOR Complete This Section For Small Claims  
 SMALL CLAIMS SUMMONS

Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
 Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?  Yes  No

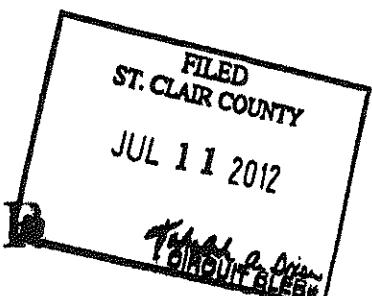
B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?  Yes  No

B. If yes, will the appointment of a guardian Ad Litem be necessary  Yes  No

SEE REVERSE FOR

CASE CLASSIFICATIONS AND CODES



**MASTER RECORD SHEET  
#126  
CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

Case Number	<u>122358</u>
Amount Claimed	\$50,000+

1. JUDY FAHRNER, individually, and on behalf  
 of all others similarly situated

RAYMOND BITAR, et al.

VS

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L	Code 01	Nature of Action Law	Code 02
TO THE SHERIFF: SERVE THIS DEFENDANT AT:			
2. Pltf. Atty. Lloyd M. Cueto	Code _____	3. NAME Julie Vianne	
Address 7110 West Main Street		Withers Harris, Cutler & Houghteling LLP (NY) Trinity Building	
City Belleville	Phone 277-1554	ADDRESS 111 Broadway	
Add. Pltf. Atty. _____	Code _____	Suite 402	
Is Personal Injury Involved	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CITY & STATE New York, NY 10006	
Does Pltf. Demand A Jury Trial	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.  CHECK FOR Complete This Section For Small Claims  
 SMALL CLAIMS SUMMONS

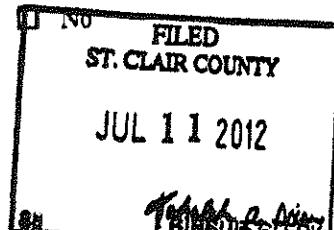
Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
 Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?  Yes  No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?  Yes  No

B. If yes, will the appointment of a guardian Ad Litem be necessary  Yes



**SEE REVERSE FOR  
 CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET**  
**CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6 Case Number 12C354  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

Amount Claimed \$50,000+

1. JUDY FAHRNER, individually, and on behalf  
of all others similarly situated

RAYMOND BITAR, et al.

VS

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L

Code 01

Nature of Action Law

Code 02

2. Pltf. Atty. Lloyd M. Cueto

Code \_\_\_\_\_

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

Address 7110 West Main StreetCity BellevillePhone 277-1554

Add. Pltf. Atty. \_\_\_\_\_

Code \_\_\_\_\_

Is Personal Injury Involved

 Yes       No

Does Pltf. Demand A Jury Trial

 Yes       No

(THIS DOES NOT CONSTITUTE A JURY DEMAND)

3. NAME Benjamin Nessim

Souede Angeli Law Group

ADDRESS 121 SW Morrison St.

Suite 400

CITY & STATE Portland, OR 972044.  CHECK FOR  
SMALL CLAIMS SUMMONS

Complete This Section For Small Claims

Please Set This Case For \_\_\_\_\_

at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_

Court Location \_\_\_\_\_

5.

A. Is an insurance carrier involved?       Yes       No

B. If yes please give company name: \_\_\_\_\_

6.

A. Is there a minor involved?       Yes       NoB. If yes, will the appointment of a guardian Ad Litem be necessary       Yes       No

SEE REVERSE FOR

CASE CLASSIFICATIONS AND CODES



**MASTER RECORD SHEET  
#128  
CIRCUIT COURT OF ST. CLAIR COUNTY**

12-L-354

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&amp;6 Case Number

Complete 4 if Small Claims Case.

Sections 3, 5 &amp; 6 For Office use Only.

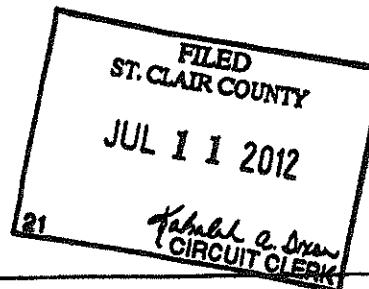
Amount Claimed \$50,000+

1. JUDY FAHRNER, individually, and on behalf  
of all others similarly situated

RAYMOND BITAR, et al.

VS

Plaintiff(s)



Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L	Code 01	Nature of Action Law	Code 02
2. Pltf. Atty. Lloyd M. Cueto Address 7110 West Main Street City Belleville Add. Pltf. Atty. _____ Is Personal Injury Involved <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Does Pltf. Demand A Jury Trial <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (THIS DOES NOT CONSTITUTE A JURY DEMAND)	Code _____	TO THE SHERIFF: SERVE THIS DEFENDANT AT: 3. NAME Ian J. Imrich Law Offices of Ian J. Imrich ADDRESS 10866 Wilshire Boulevard Suite 1240 CITY & STATE Los Angeles, CA 90024	

4.  CHECK FOR Complete This Section For Small Claims  
SMALL CLAIMS SUMMONS

Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?  Yes  No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?  Yes  No

B. If yes, will the appointment of a guardian Ad Litem be necessary  Yes  No

**SEE REVERSE FOR**

**CASE CLASSIFICATIONS AND CODES**

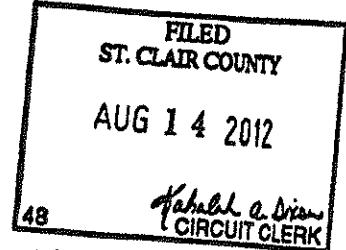


IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT  
ST CLAIR COUNTY, ILLINOIS

INITIAL MANDATORY STATUS CONFERENCE SETTING ASSIGNMENT

FAHRNER VS BITAR	12-L-0354
------------------	-----------

TO: A FILE COPY



Date : 10/4/2012

Time : 9:00 AM

Room : 404

The above-styled case is assigned to: HON. LLOYD A. CUETO.

Counsel familiar with the case and authorized to act is ordered to appear for an Initial Mandatory Status Conference on the above date, time and courtroom pursuant to Local Rule 6.06, and Supreme Court Rule 218.

At the aforesaid conference the following shall be considered:

1. Service upon all of the parties;
2. Whether the case will be jury or no-jury;
3. The nature, issues, and complexity of the case;
4. Simplification of the issues;
5. Amendments and challenges to the pleadings;
6. Admissions of fact and documents;
7. Limitations of discovery, including but not limited to written discovery, depositions, and opinion witnesses;
8. Third parties;
9. Scheduling of settlement conferences;
10. Necessity of subsequent case management conferences;
11. Trial settings.

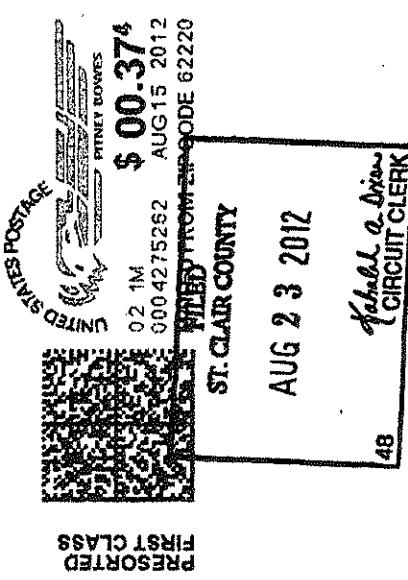
Office of Chief Judge

OFFICE OF CHIEF JUDGE  
St. CLAIR County BUILDING  
10 PUBLIC SQUARE  
BELLEVILLE, ILLINOIS 62220-1623

TEMP - RETURN SERVICE REQUESTED

2

12/3/12  
Cust



TO: REMSEN ELLIOT  
710 SANSOME ST  
SAN FRANCISCO, CA 94111

NEXTE 957 DE 15 SENDER OC 08/19/12  
RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
SIGNABLE TO FORWARD  
BC: 62220162310 \*0440-05317-17-33

02 GRAPH2209145724

State of Illinois

IN THE TWENTIETH JUDICIAL CIRCUIT, ST. CLAIR COUNTY, BELLEVILLE, ILLINOIS

PLAINTIFF

Fahrner

vs.

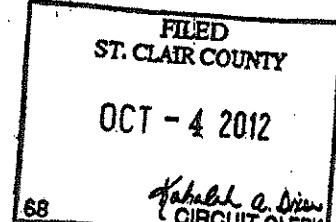
No.

12-1-0354

Defendant

DiTAR

ORDER



This cause coming before the Court; the Court being fully advised in the premises and having jurisdiction of the subject matter;

The Court finds: .....

IT IS THEREFORE ORDERED:

*The court was itself on  
the case is returned for  
re-argument*

Attorneys:

Enter:

Plaintiff

Defendant

Judge

INITIAL MANDATORY STATUS CONFERENCE SETTING ASSIGNMENT

FAHRNER VS BITAR

12-L-0354

TO: A FILE COPY

FILED  
ST. CLAIR COUNTY  
OCT 16 2012

48

*Fabrizio A. DiCarlo*  
CIRCUIT CLERK

Date : 12/6/2012

Time : 9:00 AM

Room : 404

The above-styled case is assigned to: HON. ANDREW GLEESON.

Counsel familiar with the case and authorized to act is ordered to appear for an Initial Mandatory Status Conference on the above date, time and courtroom pursuant to Local Rule 6.06, and Supreme Court Rule 218.

At the aforesaid conference the following shall be considered:

1. Service upon all of the parties;
2. Whether the case will be jury or no-jury;
3. The nature, issues, and complexity of the case;
4. Simplification of the issues;
5. Amendments and challenges to the pleadings;
6. Admissions of fact and documents;
7. Limitations of discovery, including but not limited to written discovery, depositions, and opinion witnesses;
8. Third parties;
9. Scheduling of settlement conferences;
10. Necessity of subsequent case management conferences;
11. Trial settings.

Office of Chief Judge

**OFFICE OF CHIEF JUDGE  
ST. CLAIR COUNTY BUILDING  
DETROIT, MICHIGAN**

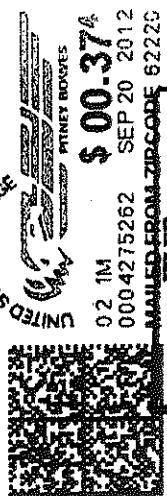
10 PUBLIC SQUARE  
BELLEVILLE, ILLINOIS 62220-1623

ITEM - RETURN SERVICE REQUESTED

1st August

**Undeliverable, Confidential Mail**  **No Authorization to Receive Mail For This Address:**

PRESORTED  
FIRST CLASS



SICK COUNTY

OCT - 8 2012

*Ashland, Oregon*  
CIRCUIT CLERK

三

RETRIEVED BY 1-SENDER 03 09/27/12.  
ATTENDED TO - NOT KNOWN  
UNABLE TO FORWARD  
REC'D: 62220162310 \*0618-00922-27-318

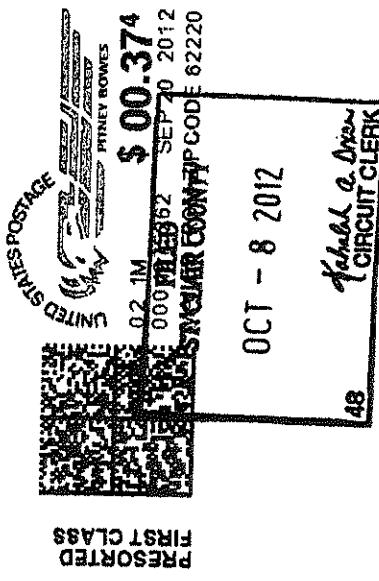
TILTWARE LLC  
10866 WILSHIRE BLVD FLOOR 4  
LOS ANGELES, CA 90024

02 HOAFL-AE2 20002623

OFFICE OF CHIEF JUDGE  
St. CLAIR County Building  
10 PUBLIC SQUARE  
BELLEVILLE, ILLINOIS 62220-1623

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TEMP - RETURN SERVICE REQUESTED



12/16/12  
8354

TO: REMSEN ELLIOT  
710 SANSOME ST  
SAN FRANCISCO, CA 94111

NAME: REMSEN ELLIOT  
RETURN TO SENDER 09/26/12  
ITEMIZED - NO KNOWN  
SHARABLE TO FORWARD  
BC: 62220162310 \*2372-04896-26-13

02 HQAFLAB7B4UQ11673

OFFICE OF CHIEF JUDGE  
ST. CLAIR COUNTY BUILDING  
10 PUBLIC SQUARE

BELLEVILLE, ILLINOIS 62220-1623  
KNA

TEMP - RETURN SERVICE REQUESTED

8/3/2012

10/25/2012

NOT KNOWN

FORWARD

10/25/2012

2472-02167-25-24

*Not for filing*

62220-1623

RECEIVED

10/25/2012

ATTEMPTED

10/25/2012

TO SENDER

10/25/2012

NOT KNOWN

FORWARD

10/25/2012

2472-02167-25-24

SERIALIZED

FILED

10/25/2012

PINNEY RODWELL

PCODE 62220

10/25/2012

10/25/2012

10/25/2012

10/25/2012

10/25/2012

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10/25/2012

FILED  
CLERK'S OFFICE  
ST. CLAIR COUNTY

OCT 29 2012

Kathleen A. Brian  
CIRCUIT CLERK

TO: SHAWN CODY  
633 BATTERY STREET  
SAN FRANCISCO, CA 94111

02 10AFSAB 94111

OFFICE OF CHIEF JUDGE  
ST. CLAIR COUNTY BUILDING  
10 PUBLIC SQUARE  
BELLEVILLE, ILLINOIS 62220-1623

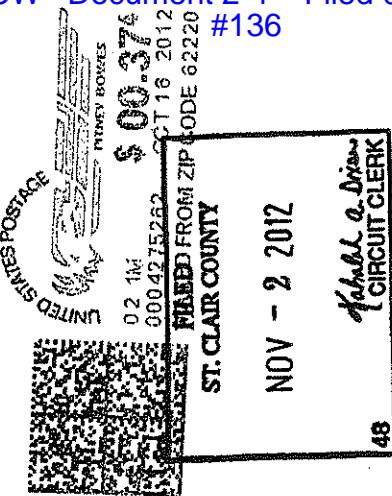
TEMP - RETURN SERVICE REQUESTED

11/2/3541  
P.M.

"Undeliverable, Commercial Mail Receiving Agent,  
No Authorization to Receive Mail For This Address."

FIRST CLASS

PRESORTED



NOV - 2 2012

*Mabel A. Dix*  
CIRCUIT CLERK

TO: TILTWARE LLC

10866 WILSHIRE BLVD FLOOR 4  
LOS ANGELES, CA 90024

NIXIE 917 DE 1 SENDER 00 10/28/12  
NOT DEFERRABLE AS ADDRESS SFD  
UNABLE TO FORWARD #0618-02160-28-25  
BC: 62220162310

11/2/3541  
P.M.

11/2/3541  
P.M.

OFFICE OF CHIEF JUDGE  
St. CLAIR COUNTY BUILDING  
10 PUBLIC SQUARE  
BELLEVILLE, ILLINOIS 62220-1623

TEMP - RETURN SERVICE REQUESTED



TO: REMSEN ELLIOT  
710 SANSOME ST  
SAN FRANCISCO, CA 94111

NIXIE 957 DE 1  
NOT RETURN TO SENDER 00 10/24/12  
UNDELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD  
BC: 62220162310 #2641-D1151-24-35

OZ INQUIRIES 34111

State of Illinois

IN THE TWENTIETH JUDICIAL CIRCUIT, ST. CLAIR COUNTY, BELLEVILLE, ILLINOIS

PLAINTIFF

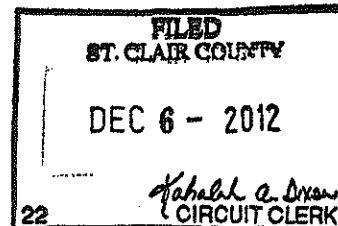
Fahrner

vs.

Defendant

Bitter-ed-1

No. 12-L-354



ORDER

This cause coming before the Court; the Court being fully advised in the premises and having jurisdiction of the subject matter;

The Court finds: Plaintiff still effecting service

IT IS THEREFORE ORDERED: on defendants. Matter

reset for 3/04/13 at 9am in  
court 404.

Attorneys:

.....  
  
Plaintiff

Enter:

.....  
  
Judge

.....  
Defendant

**MASTER RECORD SHEET  
CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
Complete 4 if Small Claims Case.  
Sections 3, 5 & 6 For Office use Only.

Case Number 12 L 354Amount Claimed \$50,000+

1. Judy Fahrner

Raymond Bitar et al.

VS

Alias

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>	Code <u>02</u>
TO THE SHERIFF: SERVE THIS DEFENDANT AT:			
2. Pltf. Atty. <u>Lloyd M. Cueto</u> Code _____		3. NAME <u>Raymond Bitar</u>	
Address <u>7110 West Main Street</u>		ADDRESS <u>10866 Wilshire Boulevard, 4th Floor</u>	
City <u>Belleville</u>	Phone <u>277-1554</u>		
Add. Pltf. Atty. <u>Michael Gras</u> Code _____		CITY & STATE <u>Los Angeles, CA 90024</u>	
Is Personal Injury Involved <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Does Pltf. Demand A Jury Trial <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.  CHECK FOR  
SMALL CLAIMS SUMMONS      Complete This Section For Small Claims  
Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?       Yes       No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?       Yes       No

B. If yes, will the appointment of a guardian Ad Litem be necessary       Yes       No

FILED  
 ST. CLAIR COUNTY  
 JAN 25 2013

**SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET**  
**CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6 Complete 4 if Small Claims Case. Sections 3, 5 & 6 For Office use Only.	Case Number <u>12 L 354</u>
	Amount Claimed <u>\$50,000+</u>

1. Judy Fahrner

Raymond Bitar et al.

VS

Alias

Plaintiff(s)

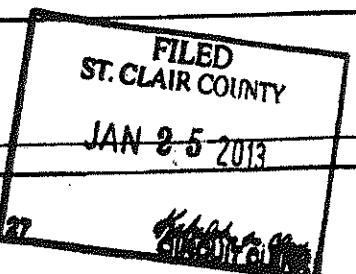
Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>	Code <u>02</u>
TO THE SHERIFF: SERVE THIS DEFENDANT AT:			
2. Pltf. Atty. <u>Lloyd M. Cueto</u>	Code _____	3. NAME <u>Johnson Juanda</u>	
Address <u>7110 West Main Street</u>		ADDRESS <u>2563 Red Springs Drive</u>	
City <u>Belleville</u>	Phone <u>277-1554</u>		
Add. Pltf. Atty. <u>Michael Gras</u>	Code _____	CITY & STATE <u>Las Vegas, NV 89135</u>	
Is Personal Injury Involved			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Does Pltf. Demand A Jury Trial			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.  CHECK FOR  
SMALL CLAIMS SUMMONS      Complete This Section For Small ClaimsPlease Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
Court Location \_\_\_\_\_5. A. Is an insurance carrier involved?     Yes     No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?     Yes     NoB. If yes, will the appointment of a guardian Ad Litem be necessary     Yes     No

**SEE REVERSE FOR**  
**CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET  
CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
Complete 4 if Small Claims Case.  
Sections 3, 5 & 6 For Office use Only.

Case Number 12 L 354Amount Claimed \$50,000+

1. Plaintiff(s)

Raymond Bitar et al.

VS

Alias

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>	Code <u>02</u>
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2. Pltf. Atty. <u>Lloyd M. Cueto</u>	Code _____	TO THE SHERIFF: SERVE THIS DEFENDANT AT:	
Address <u>7110 West Main Street</u>		<b>3. NAME</b> <u>Nelson Burtnick</u>	
City <u>Belleview</u>	Phone <u>277-1554</u>	ADDRESS <u>10866 Wilshire Boulevard, 4th Floor</u>	
Add. Pltf. Atty. <u>Michael Gras</u>	Code _____	CITY & STATE <u>Los Angeles, CA 90024</u>	
Is Personal Injury Involved			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Does Pltf. Demand A Jury Trial			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.  **CHECK FOR  
SMALL CLAIMS SUMMONS**      Complete This Section For Small Claims

Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
Court Location \_\_\_\_\_

**FILED  
ST. CLAIR COUNTY  
JAN 25 2013**

5. A. Is an insurance carrier involved?     Yes     No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?     Yes     No

B. If yes, will the appointment of a guardian Ad Litem be necessary     Yes     No

**SEE REVERSE FOR**

**CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET  
CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

Case Number 12 L 354Amount Claimed \$50,000+

1. Judy Fahrner

Raymond Bitar et al.

VS

Alias

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>	Code <u>02</u>
TO THE SHERIFF: SERVE THIS DEFENDANT AT:			
2. Pltf. Atty. <u>Lloyd M. Cueto</u>	Code _____	3. NAME <u>Christopher Ferguson</u>	
Address <u>7110 West Main Street</u>		ADDRESS <u>6725 Silvery Avenue</u>	
City <u>Belleview</u>	Phone <u>277-1554</u>		
Add. Pltf. Atty. <u>Michael Gras</u>	Code _____	CITY & STATE <u>Las Vegas, NV 89108</u>	
Is Personal Injury Involved <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Does Pltf. Demand A Jury Trial <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

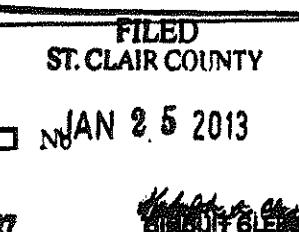
4.  CHECK FOR  
SMALL CLAIMS SUMMONS Complete This Section For Small ClaimsPlease Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
 Court Location \_\_\_\_\_

5.

A. Is an insurance carrier involved?  Yes       No

B. If yes please give company name: \_\_\_\_\_

6.

A. Is there a minor involved?  Yes       NoB. If yes, will the appointment of a guardian Ad Litem be necessary  Yes

**SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET  
#145**  
**CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf, Atty or Pro Se Pltf Must Complete Sections 1,2,3,5,&6 Case Number 12 L 354  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

Amount Claimed \$50,000+

1. Judy Fahrner

Raymond Bitar et al.

VS

Alias

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>	Code <u>02</u>
--------------------------------	----------------	-----------------------------	----------------

2. Pltf. Atty. Lloyd M. Cueto Code \_\_\_\_\_  
 Address 7110 West Main Street  
 City Belleview Phone 277-1554  
 Add. Pltf. Atty. Michael Gras Code \_\_\_\_\_  
 Is Personal Injury Involved  
 Yes  No  
 Does Pltf. Demand A Jury Trial  
 Yes  No  
 (THIS DOES NOT CONSTITUTE A JURY DEMAND)

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

3. NAME Howard Lederer

ADDRESS 99 Hawk Ridge Drive

CITY & STATE Las Vegas, NV 89135

4.  CHECK FOR  
SMALL CLAIMS SUMMONS Complete This Section For Small Claims

Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
 Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?  Yes  No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?  Yes  No

B. If yes, will the appointment of a guardian Ad Litem be necessary  Yes

<input type="checkbox"/> <u>FILED</u>
<u>ST. CLAIR COUNTY</u>
<u>JAN 25 2013</u>

27

**SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET**  
**CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
Complete 4 if Small Claims Case.  
Sections 3, 5 & 6 For Office use Only.

Case Number 12 L 354Amount Claimed \$50,000+

1. Judy Fahrner

Raymond Bitar et al.

VS

Alias

Plaintiff(s)

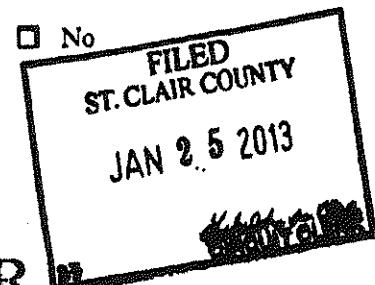
Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L	Code 01	Nature of Action Law	Code 02
2. Pltf. Atty. <u>Lloyd M. Cueto</u>	Code _____	TO THE SHERIFF: SERVE THIS DEFENDANT AT:	
Address <u>7110 West Main Street</u>		3. NAME <u>Phillip Ivey, Jr.</u>	
City <u>Belleville</u>	Phone <u>277-1554</u>	ADDRESS <u>9103 Alta Drive #1601</u>	
Add. Pltf. Atty. <u>Michael Gras</u>	Code _____	CITY & STATE <u>Las Vegas, NV 89145</u>	
Is Personal Injury Involved			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Does Pltf. Demand A Jury Trial			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.  CHECK FOR  
SMALL CLAIMS SUMMONS      Complete This Section For Small ClaimsPlease Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
Court Location5. A. Is an insurance carrier involved?     Yes     No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?     Yes     NoB. If yes, will the appointment of a guardian Ad Litem be necessary     Yes     No

SEE REVERSE FOR

CASE CLASSIFICATIONS AND CODES



**MASTER RECORD SHEET**  
**CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
Complete 4 if Small Claims Case.  
Sections 3, 5 & 6 For Office use Only.

Case Number 12 L 354Amount Claimed \$50,000+1. Plaintiff(s) Judy FahrnerDefendant(s) Raymond Bitar et al.

VS

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>	Code <u>02</u>
--------------------------------	----------------	-----------------------------	----------------

2. Pltf. Atty. Lloyd M. Cueto Code \_\_\_\_\_  
 Address 7110 West Main Street  
 City Belleville Phone 277-1554  
 Add. Pltf. Atty. Michael Gras Code \_\_\_\_\_  
 Is Personal Injury Involved  
 Yes  No  
 Does Pltf. Demand A Jury Trial  
 Yes  No  
 (THIS DOES NOT CONSTITUTE A JURY DEMAND)

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

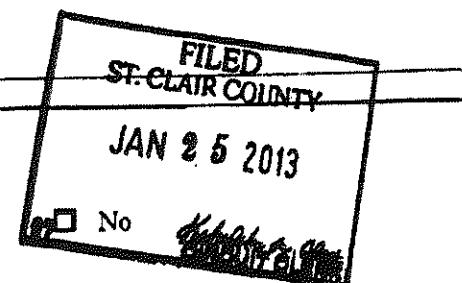
3. NAME Rational FT Enterprises Limited

ADDRESS 33-37 Athol Street

CITY &amp; STATE Douglas, IM1 1LB, Isle of Man

4.  CHECK FOR  
SMALL CLAIMS SUMMONS Complete This Section For Small ClaimsPlease Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
Court Location \_\_\_\_\_5. A. Is an insurance carrier involved?  Yes  No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?  Yes  NoB. If yes, will the appointment of a guardian Ad Litem be necessary  Yes  No

**SEE REVERSE FOR**  
**CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET  
CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
Complete 4 if Small Claims Case.  
Sections 3, 5 & 6 For Office use Only.

Case Number 12 L 354Amount Claimed \$50,000+

1. Judy Fahrner

Raymond Bitar et al.

VS

Alias

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix LCode 01Nature of Action LawCode 02

2. Pltf. Atty. Lloyd M. Cueto Code \_\_\_\_\_  
 Address 7110 West Main Street  
 City Belleville Phone 277-1554  
 Add. Pltf. Atty. Michael Gras Code \_\_\_\_\_  
 Is Personal Injury Involved  
 Yes  No  
 Does Pltf. Demand A Jury Trial  
 Yes  No  
 (THIS DOES NOT CONSTITUTE A JURY DEMAND)

TO THE SHERIFF: SERVE THIS DEFENDANT AT:  
 3. NAME Tiltware, LLC  
 c/o Paracorp Inc.  
 ADDRESS 2804 Gateway Oaks Drive  
Suite 200  
CITY & STATE Sacramento, CA 95833

4.  CHECK FOR  
SMALL CLAIMS SUMMONS

Complete This Section For Small Claims

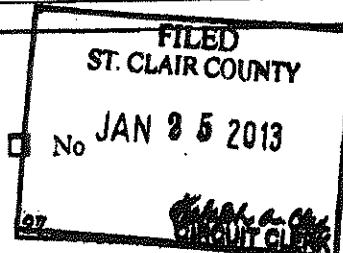
Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
Court Location

5.

A. Is an insurance carrier involved?  Yes  No

B. If yes please give company name: \_\_\_\_\_

6.

A. Is there a minor involved?  Yes  NoB. If yes, will the appointment of a guardian Ad Litem be necessary  Yes  No

**SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET  
CIRCUIT COURT OF ST. CLAIR COUNTY**

12 L 354

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

Case Number \_\_\_\_\_

Amount Claimed \$50,000+

1. Judy Fahrner

Raymond Bitar et al.

VS

Arias

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L

Code 01

Nature of Action Law

Code 02

2. Pltf. Atty. Lloyd M. Cueto Code \_\_\_\_\_  
 Address 7110 West Main Street  
 City Belleville Phone 277-1554  
 Add. Pltf. Atty. Michael Gras Code \_\_\_\_\_  
 Is Personal Injury Involved  
 Yes  No  
 Does Pltf. Demand A Jury Trial  
 Yes  No  
 (THIS DOES NOT CONSTITUTE A JURY DEMAND)

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

3. NAME Jennifer Harmon-Taniello

ADDRESS 9700 Timothy Drive

CITY &amp; STATE Reno, NV 89511

4.  CHECK FOR  
SMALL CLAIMS SUMMONS

Complete This Section For Small Claims

Please Set This Case For \_\_\_\_\_

at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_

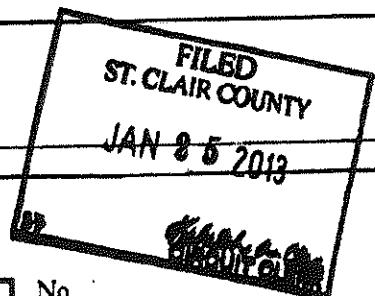
Court Location

5.

A. Is an insurance carrier involved?  Yes  No

B. If yes please give company name: \_\_\_\_\_

6.

A. Is there a minor involved?  Yes  NoB. If yes, will the appointment of a guardian Ad Litem be necessary  Yes  No

SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES



**MASTER RECORD SHEET  
CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
Complete 4 if Small Claims Case.  
Sections 3, 5 & 6 For Office use Only.

Case Number 12 L 354Amount Claimed \$50,000+

1. Plaintiff(s)

Raymond Bitar et al.

VS

Alias

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix LCode 01Nature of Action LawCode 022. Pltf. Atty. Lloyd M. CuetoCode       Address 7110 West Main StreetCity Belleville Phone 277-1554Add. Pltf. Atty. Michael GrasCode       

Is Personal Injury Involved

 Yes       No

Does Pltf. Demand A Jury Trial

 Yes       No

(THIS DOES NOT CONSTITUTE A JURY DEMAND)

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

3. NAME Erick LindgrenADDRESS 1481 Bench RoadCITY & STATE New Port, WA 991564.  CHECK FOR  
SMALL CLAIMS SUMMONS

Complete This Section For Small Claims

Please Set This Case For \_\_\_\_\_

at \_\_\_\_\_

Court Location \_\_\_\_\_

FILED
ST. CLAIR COUNTY
M. On
JAN 8 2013

20

5.

A. Is an insurance carrier involved?  Yes       No

B. If yes please give company name: \_\_\_\_\_

6.

A. Is there a minor involved?  Yes       NoB. If yes, will the appointment of a guardian Ad Litem be necessary  Yes       No

**SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET**  
**CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
Complete 4 if Small Claims Case.  
Sections 3, 5 & 6 For Office use Only.

Case Number 12 L 354Amount Claimed \$50,000+

1. Judy Fahrner

Raymond Bitar et al.

VS

Arias

Plaintiff(s)

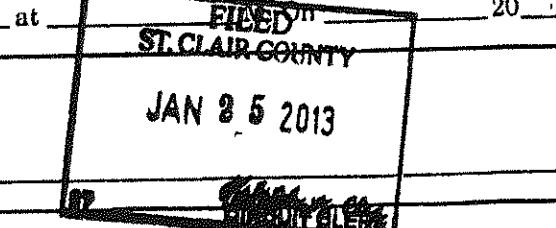
Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>	Code <u>02</u>
TO THE SHERIFF: SERVE THIS DEFENDANT AT:			
2. Pltf. Atty. <u>Lloyd M. Cueto</u>	Code _____	3. NAME <u>Phillip Gordon</u>	
Address <u>7110 West Main Street</u>		ADDRESS <u>1481 Bench Road</u>	
City <u>Belleville</u>	Phone <u>277-1554</u>		
Add. Pltf. Atty. <u>Michael Gras</u>	Code _____	CITY & STATE <u>New Port, WA 99156</u>	
Is Personal Injury Involved			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Does Pltf. Demand A Jury Trial			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.  CHECK FOR Complete This Section For Small Claims  
SMALL CLAIMS SUMMONS

Please Set This Case For \_\_\_\_\_ Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?  Yes  No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?  Yes  NoB. If yes, will the appointment of a guardian Ad Litem be necessary  Yes  No

**SEE REVERSE FOR**  
**CASE CLASSIFICATIONS AND CODES**

**MASTER RECORD SHEET  
CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
Complete 4 if Small Claims Case.  
Sections 3, 5 & 6 For Office use Only.

Case Number 12 L 354Amount Claimed \$50,000+

1. Judy Fahrner

Raymond Bitar et al.

VS

Alia S

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix LCode 01Nature of Action LawCode 02

2. Pltf. Atty. Lloyd M. Cueto Code \_\_\_\_\_  
 Address 7110 West Main Street  
 City Belleville Phone 277-1554  
 Add. Pltf. Atty. Michael Gras Code \_\_\_\_\_  
 Is Personal Injury Involved  
 Yes  No  
 Does Pltf. Demand A Jury Trial  
 Yes  No  
 (THIS DOES NOT CONSTITUTE A JURY DEMAND)

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

3. NAME Allen CunninghamADDRESS 7920 Castle Pines DriveCITY & STATE Las Vegas, NV 891134.  CHECK FOR  
SMALL CLAIMS SUMMONS

Complete This Section For Small Claims

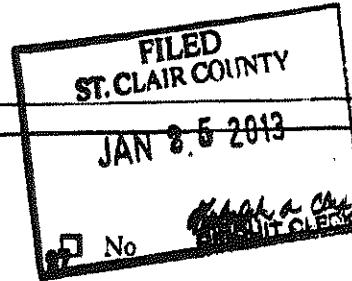
Please Set This Case For \_\_\_\_\_

at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_

Court Location

5. A. Is an insurance carrier involved?  Yes  No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?  Yes  NoB. If yes, will the appointment of a guardian Ad Litem be necessary  Yes  No

**SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET  
CIRCUIT COURT OF ST. CLAIR COUNTY**

12 L 354

Note: Pltf. Atty or Pro Se Pltf Must Complete Sections 1,2,3,5,&6 Case Number \_\_\_\_\_  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only. Amount Claimed \$50,000+

1. Judy Fahrner

Raymond Bitar et al.

VS

Arias

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L

Code 01

Nature of Action Law

Code 02

2. Pltf. Atty. Lloyd M. Cueto

Code \_\_\_\_\_

Address 7110 West Main Street

City Belleville

Phone 277-1554

Add. Pltf. Atty. Michael Gras

Code \_\_\_\_\_

Is Personal Injury Involved

 Yes       No

Does Pltf. Demand A Jury Trial

 Yes       No

(THIS DOES NOT CONSTITUTE A JURY DEMAND)

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

3. NAME Mike Matusow

ADDRESS 1763 Quiver Point Avenue

CITY &amp; STATE Henderson NV 89012

4.  CHECK FOR  
SMALL CLAIMS SUMMONS

Complete This Section For Small Claims

Please Set This Case For \_\_\_\_\_

at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_

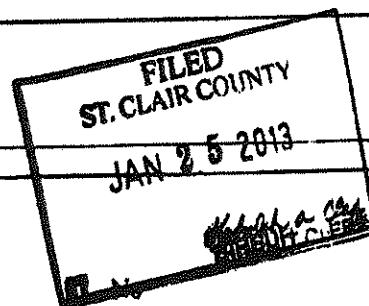
Court Location

5.

A. Is an insurance carrier involved?  Yes       No

B. If yes please give company name: \_\_\_\_\_

6.

A. Is there a minor involved?  Yes       NoB. If yes, will the appointment of a guardian Ad Litem be necessary  Yes

**SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET**  
**CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6  
Complete 4 if Small Claims Case.  
Sections 3, 5 & 6 For Office use Only.

Case Number	12 L 354
Amount Claimed	\$50,000+

1. Plaintiff(s)     <b>Alia S</b>	Raymond Bitar et al.     <b>Defendant(s)</b>
VS	

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>
		Code <u>02</u>
TO THE SHERIFF: SERVE THIS DEFENDANT AT:		
2. Pltf. Atty. <u>Lloyd M. Cueto</u> Code _____ Address <u>7110 West Main Street</u> City <u>Belleville</u> Phone <u>277-1554</u> Add. Pltf. Atty. <u>Michael Gras</u> Code _____ Is Personal Injury Involved <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Does Pltf. Demand A Jury Trial <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (THIS DOES NOT CONSTITUTE A JURY DEMAND)		
3. NAME <u>Andrew Bloch</u>  ADDRESS <u>8941 Diamond Falls Drive, #101ED</u>  CITY & STATE <u>Las Vegas, NV 89117</u>		

4. <input type="checkbox"/> <u>CHECK FOR SMALL CLAIMS SUMMONS</u>	Complete This Section For Small Claims
Please Set This Case For _____ at _____ M. On _____ 20_____ Court Location _____	

5. A. Is an insurance carrier involved? <input type="checkbox"/> Yes <input type="checkbox"/> No B. If yes please give company name: _____	
6. A. Is there a minor involved? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B. If yes, will the appointment of a guardian Ad Litem be necessary <input type="checkbox"/> Yes <input type="checkbox"/> No	

**FILED  
ST. CLAIR COUNTY**  
**JAN 26 2013**

**SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES**



**MASTER RECORD SHEET  
CIRCUIT COURT OF ST. CLAIR COUNTY**

12 L 354

Note: Pltf. Atty or Pro Se Pltf Must Complete Sections 1,2,3,5,&6 Case Number \_\_\_\_\_  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only. Amount Claimed \$50,000+

1. Judy Fahrner

Raymond Bitar et al.

VS

Alias

Plaintiff(s)

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix L

Code 01

Nature of Action Law

Code 02

2. Pltf. Atty. Lloyd M. Cueto

Code \_\_\_\_\_

Address 7110 West Main Street

City Belleville

Phone 277-1554

Add. Pltf. Atty. Michael Gras

Code \_\_\_\_\_

Is Personal Injury Involved

 Yes       No

Does Pltf. Demand A Jury Trial

 Yes       No

(THIS DOES NOT CONSTITUTE A JURY DEMAND)

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

3. NAME Erick Seidel

ADDRESS 9733 Queen Charlotte Drive

CITY &amp; STATE Las Vegas, NV 89145

4.  CHECK FOR  
SMALL CLAIMS SUMMONS

Complete This Section For Small Claims

Please Set This Case For \_\_\_\_\_

at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_

Court Location

5.

A. Is an insurance carrier involved?  Yes       No

B. If yes please give company name: \_\_\_\_\_

6.

A. Is there a minor involved?  Yes       NoB. If yes, will the appointment of a guardian Ad Litem be necessary  Yes       No

SEE REVERSE FOR

CASE CLASSIFICATIONS AND CODES



IN THE CIRCUIT COURT OF THE  
TWENTIETH JUDICIAL CIRCUIT ST. CLAIR  
COUNTY, ILLINOIS

JUDY FAHRNER, individually, and on behalf of all  
others similarly situated

) Case No.: 12 L 354

Plaintiffs,

v.

RAYMOND BITAR; NELSON BURTNICK;  
FULL TILT POKER, LTD; TILTWARE, LLC;  
VANTAGE, LTD; FILCO, LTD.; KOLYMA CORP.  
A.V.V.; POCKET KINGS LTD.;  
POCKET KINGS CONSULTING LTD.;  
RANSTON LTD.; MAIL MEDIA LTD.;  
HOWARD LEDERER; PHILLIP IVEY JR.;  
CHRISTOPHER FERGUSON; JOHNSON  
JUANDA; JENNIFER HARMON-TRANIELLO;  
PHILLIP GORDON; ERICK LINDGREN; ERIK  
SEIDEL; ANDREW BLOCH; MIKE MATUSOW;  
GUS HANSEN; ALLEN CUNNINGHAM; PATRIK  
ANTONIUS, RAFAEL FURST, RATIONAL FT  
ENTERPRISES LIMITED.

FILED  
ST. CLAIR COUNTY  
JAN 25 2013  
SHERIFF'S OFFICE  
RECEIVED

) CLASS ACTION COMPLAINT

) JURY TRIAL DEMAND

Defendants.

**MOTION FOR LEAVE TO AMEND PURSUANT TO 735 ILCS 5/2-616  
TO FILE THE FIRST AMENDED COMPLAINT**

COME NOW the Plaintiff, by and through counsel, and in support of her Motion for Leave to Amend Pursuant to 735 ILCS 5/2-616 to file the First Amended Complaint, state as follows:

1. Plaintiff filed her original Complaint in this matter on July 11, 2012.
2. Investigation reveals that Rational FT Enterprises is a proper party to this action and has been added to Plaintiff's First Amended Complaint.
3. Section 2-616(a) of the Code of Civil Procedure provides, in pertinent part, that "[a]t any time before final judgment amendments may be allowed on just and reasonable terms, introducing

any party." 735 ILCS 5/2-616(a) (West 2006). Section 2-616(a) allows for amendments that may enable the plaintiff to sustain the claim for which it was intended to be brought, particularly where doing so does not prevent the defendant from making a defense.

4. The Defendants will suffer no legal prejudice by allowing the filing of the First Amended Complaint.

WHEREFORE, the Plaintiffs pray that the Court grant the filing of the Plaintiff's First Amended Complaint.



---

Lloyd M. Cueto, IL #06292629  
Law Office of Lloyd M. Cueto  
7110 West Main Street  
Belleville, IL 62223  
Phone: (618) 277-1554  
Fax: (618) 277-0962

**ATTORNEYS FOR PLAINTIFF**

IN THE CIRCUIT COURT OF THE  
TWENTIETH JUDICIAL CIRCUIT ST. CLAIR  
COUNTY, ILLINOIS

JUDY FAHRNER, individually, and on behalf of all  
others similarly situated

) Case No.: 12 L 354

) FILED  
ST. CLAIR COUNTY  
JAN 25 2013  
a3

Plaintiffs,

v.

) RAYMOND BITAR; NELSON BURTNICK;  
FULL TILT POKER, LTD; TILTWARE, LLC;  
VANTAGE, LTD; FILCO, LTD.; KOLYMA CORP.  
A.V.V.; POCKET KINGS LTD.;  
POCKET KINGS CONSULTING LTD.;  
RANSTON LTD.; MAIL MEDIA LTD.;  
HOWARD LEDERER; PHILLIP IVEY JR.;  
CHRISTOPHER FERGUSON; JOHNSON  
JUANDA; JENNIFER HARMON-TRANIEMO;  
PHILLIP GORDON; ERICK LINDGREN; ERIK  
SEIDEL; ANDREW BLOCH; MIKE MATUSOW;  
GUS HANSEN; ALLEN CUNNINGHAM; PATRIK  
ANTONIUS, RAFAEL FURST, RATIONAL FT  
ENTERPRISES LIMITED.

) CLASS ACTION COMPLAINT

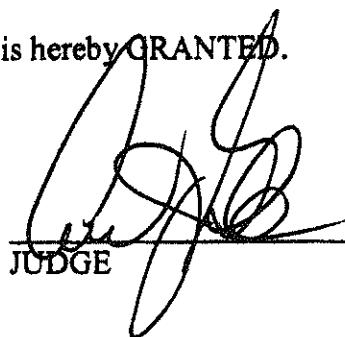
) JURY TRIAL DEMAND

Defendants.)

ORDER

For good cause shown, Plaintiff's Motion for Leave to Amend Pursuant to 735 ILCS 5/2-  
616 and to File the First Amended Complaint is hereby GRANTED.

January 25, 2013  
DATE

  
JUDGE

ST CLAIR COUNTY  
TWENTIETH CIRCUIT COURT, KAHALAH A. DIXON

RECEIPT #: C 000320666  
RECEIVED OF: CUETO LLOYD A  
PART. ID: 1536  
BY CLERK: MG  
CHECKS: A 2033

DATE: 01-25-2013

TIME: 10:31:26  
MEMO:

\$80.00

CASH  
\$0.00

CREDIT  
\$0.00

CHANGE  
\$0.00

OTHER  
\$0.00

CASE NUMBER  
12-L-0354  
FAHRNER VS BITAR  
PARTY: CUETO LLOYD A  
  
12-L-0444  
SONNENBERG VS SCHEINBERG  
PARTY: CUETO LLOYD A

EVENT	COURT/JUDGE	TAX NO.	AMOUNT
2010	PMT:CALSUM ALIAS SUMMONS		\$70.00
2010	PMT:CALSUM ALIAS SUMMONS		\$10.00
TOTAL RECEIPT...			\$80.00

- \* CHECK/CHEQUE IS CONDITIONAL PAYMENT
- \* PENDING RECEIPT OF FUNDS FROM BANK.

**MASTER RECORD SHEET  
CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf Must Complete Sections 1,2,3,5,&6  
 Complete 4 if Small Claims Case.  
 Sections 3, 5 & 6 For Office use Only.

100 X/

Case Number 12 L 354  
 Amount Claimed \$50,000+

1. Judy Fahrner

Raymond Bitar et al.

VS

Alias

Plaintiff(s)

Alias

Defendant(s)

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>	Code <u>02</u>
TO THE SHERIFF: SERVE THIS DEFENDANT AT:			
2. Pltf. Atty. <u>Lloyd M. Cueto</u>	Code _____	3. NAME <u>Tiltware, LLC</u>	
Address <u>7110 West Main Street</u>		c/o Paracorp Inc.	
City <u>Belleville</u>	Phone <u>277-1554</u>	ADDRESS <u>2804 Gateway Oaks Drive</u>	
Add. Pltf. Atty. <u>Michael Gras</u>	Code _____	Suite <u>200</u>	
Is Personal Injury Involved			
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	CITY & STATE <u>Sacramento, CA 95833</u>	
Does Pltf. Demand A Jury Trial			
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

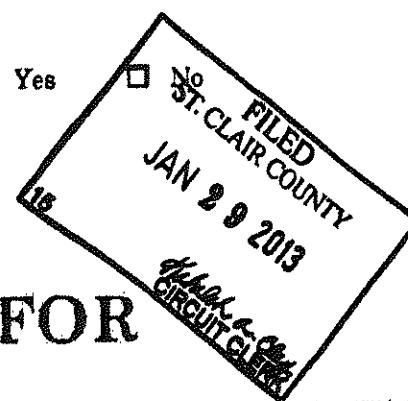
4.  CHECK FOR  
SMALL CLAIMS SUMMONS Complete This Section For Small ClaimsPlease Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
 Court Location \_\_\_\_\_

5.

A. Is an insurance carrier involved?  Yes  No

B. If yes please give company name: \_\_\_\_\_

6.

A. Is there a minor involved?  Yes  NoB. If yes, will the appointment of a guardian Ad Litem be necessary  Yes

**SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES**



## CODE - NATURE OF ACTION

CASE CLASSIFICATION			CODE - NATURE OF ACTION		
Type of Case		Prefix	Code		
<b>Law over \$15,000</b>	Jury	L	01	LAWS - (L Cases): Cases over \$15,000 LM Cases: \$1,000 to \$15,000	DIVORCE (D Cases):
	Non-Jury	L	02	1. Tort - Money Damages - Auto 2. Tort - Money Damages - Other 3. Contract - Money Damages 4. Confession of Judgment 5. Foreclosure and Detainer 6. Distress for Rent 7. Statutory Action by State to Recover Support or Contribution 8. Arbitration and Award 9. Detinue 10. Ejectment 11. Replevin 12. Power 13. Other (Specify):	1. Divorce 2. Annulment 3. Separate Maintenance 4. Other
<b>Law \$1,000 to \$15,000</b>	Jury	LM	03	SMALL CLAIMS - SC CASES \$1,000 and Under	ADMINISTRATION OF ESTATES (P Cases)
	Non-Jury	LM	04	1. Tort or Contract for money 2. Collection of Taxes 3. Other (Specify):	1. Decedent - Testate 2. Decedent - Intestate 3. Conservatorship of Person 4. Conservatorship of Estate 5. Conservatorship of Person and Estate 6. Guardianship of Person 7. Guardianship of Estate 8. Guardianship of Person and Estate 9. Administration to Collect 10. Other (Specify):
<b>\$1,000.00 &amp; under Small Claims</b>	SC	05			TAX (TX Cases): Relating to taxes and special assessments (excluding tax cases under small claim procedure) (including:
<b>TAX</b>	TX	06			1. Recovery of Delinquent Personal Property Taxes 2. Real Estate or Chattel Mortgage Foreclosure 3. Mechanic Lien Foreclosure 4. Partnership Dissolution 5. Specific Performance 6. Will Contest 7. Construction of Will 8. Construction of Inter Vivos Trust 9. Construction of Testamentary Trust 10. Trust Administration 11. Quiet Title 12. Other (Specify):
<b>Eminent Domain</b>	ED	07			CHANCERY - (CH Cases): ORIGINAL actions for equitable relief, except DIVORCE:
<b>Misc. Remedies</b>	MR	08			1. Injunctions (except in TAX cases) 2. Real Estate or Chattel Mortgage Foreclosure 3. Mechanic Lien Foreclosure 4. Partnership Dissolution 5. Specific Performance 6. Will Contest 7. Construction of Will 8. Construction of Inter Vivos Trust 9. Construction of Testamentary Trust 10. Trust Administration 11. Quiet Title 12. Other (Specify):
<b>Chancery</b>	CH	09			DIVORCE (D Cases):
<b>Family</b>	F	10			1. Injunctions (except in TAX cases) 2. Real Estate or Chattel Mortgage Foreclosure 3. Mechanic Lien Foreclosure 4. Partnership Dissolution 5. Specific Performance 6. Will Contest 7. Construction of Will 8. Construction of Inter Vivos Trust 9. Construction of Testamentary Trust 10. Trust Administration 11. Quiet Title 12. Other (Specify):
<b>Divorce</b>	D	11			MISCELLANEOUS REMEDIES (MR Cases)
<b>Probate</b>	P	12			1. Review of Administrative Proceedings (Other than Tax Commissions) 2. Declaratory Judgment 3. Corporation Dissolution 4. Change of Name 5. Habeas Corpus (Civil) 6. Mandamus 7. Prohibition 8. Quo Warranto 9. Attachment, Original action for 10. Ne Exeat, Original action for 11. Escheat 12. State Fugitives regardless of family 13. Birth Records 14. Ceationari 15. Election Contest 16. Other (Specify):
<b>Felony</b>	CF	13			EMINENT DOMAIN (ED Cases)
<b>Juvenile</b>	J	14			MENTAL HEALTH (MH Cases) (Only if original action)
<b>Mental Health</b>	MH	15			1. Commitment 2. Petition for Discharge 3. Petition for Restoration 4. Other (Specify):
<b>Municipal Corporations</b>	MC	16			

ST CLAIR COUNTY  
TWENTIETH CIRCUIT COURT, KAHALAH A. DIXON

RECEIPT #: C 000320885  
RECEIVED OF: CUETO LLOYD M  
PART. ID: 726303  
BY CLERK: gt  
CHECKS: A 2057

DATE: 01-29-2013

TIME: 11:19:26  
MEMO:

\$5.00

CASH \$0.00	CREDIT \$0.00	CHANGE \$0.00	OTHER \$0.00
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CASE NUMBER	EVENT	COURT/JUDGE	TAX NO.	AMOUNT
12-L-0354 FAHRNER VS BITAR PARTY: CUETO LLOYD M	2010	PMT:CALSUM ALIAS SUMMONS		\$5.00
			TOTAL RECEIPT...	\$5.00

\* CHECK/CHEQUE IS CONDITIONAL PAYMENT  
\* PENDING RECEIPT OF FUNDS FROM BANK. \*



ST CLAIR COUNTY  
TWENTIETH CIRCUIT COURT, KAHALAH A. DIXON

RECEIPT #: C 000321010 DATE: 01-30-2013 TIME: 16:16:00  
RECEIVED OF: MATHIS MARIFIAN & RICHTER LTD MEMO: 12L354  
PART. ID: 816806 FAHRNER VS BITAR  
BY CLERK: MG  
CHECKS: SUSPENSE ACCT ID: 00000002

CASH	CREDIT	CHANGE	OTHER
\$0.00	\$0.00	\$0.00	\$21.00

CASE NUMBER	EVENT	COURT/JUDGE	TAX NO.	AMOUNT
	2021	PMT:CCOPY COPIES		\$21.00
			TOTAL RECEIPT...	\$21.00

ATTORNEY (Name and Address):  <b>Law Office of Lloyd M Cuelo 7110 West Main St Belleville, IL 62223</b>	SBN:  <b>(618) 277-1554</b>	FOR COURT USE ONLY
E-MAIL:  <b>Judy Fahrner</b>	NAME OF COURT, JUDICIAL DISTRICT or BRANCH COURT, IF ANY:  <b>State of Illinois, InThe Circuit Ct. , IL</b>	
PLAINTIFF:  <b>Judy Fahrner</b>	COURT CASE NO.:  <b>12L354</b>	
DEFENDANT:  <b>Raymond Bitar, et al</b>	LEVYING OFFICER FILE NO.:  <b>2073062463</b>	
<b>Proof of Service - Summons</b>		

1. At the time of the service I was at least 18 years of age and not a party to this action.
2. I served copies of the:  
f. other (specify documents): **Summons and Complaint**
3. a. Party served: **Tiltware, LLC**  
b. Person (other than the party in item 3a) served on behalf of the entity or as an authorized agent (and not a person under item 5b on whom substituted service was made): **Paracorp Incorporated, Agent, by leaving with Jancy Reyes, Client Representative, per policies and procedures per 416.90**
4. Address where party was served: **2804 Gateway Oaks Dr Ste 200  
Sacramento, CA 958334346**
5. I served the party:  
a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of the process for the party (1) on: 02/06/2013 (2) at: 01:35 PM.
7. Person who served papers:  
a. Name: **D. Snow**  
b. Address: **Sheriff's Civil Bureau 3341 Power Inn Road, #313 Sacramento, CA 95826-3889**  
c. Telephone Number: **(916) 875-2665**  
d. The fee for service was: **\$35.00**
8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  
**DONNA SNOW**

Friday, February 08, 2013

Sheriff's Authorized Agent  
Scott R. Jones, Sheriff

Hearing: <No Information>

Remarks

Law Office of Lloyd M Cueto  
7110 West Main St  
Belleville, IL 62223

\*\*\* This certificate ONLY for out of state courts \*\*\*  
**CERTIFICATE OF ACKNOWLEDGEMENT**

State of California  
County of Sacramento

On \_\_\_\_\_, before me \_\_\_\_\_, personally appeared \_\_\_\_\_, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY of PERJURY under the laws of the state of California that the foregoing paragraph is true and correct.

(NOTARY SEAL)

WITNESS my hand and official seal.

## CIRCUIT COURT FOR THE 20TH JUDICIAL CIRCUIT

State of Illinois )  
County of St. Clair ) S.S.Case Number 12 L 354Amount Claimed \$50,000+

Judy Fahrner

Raymond Bitar et al.

VS

Alias

Plaintiff(s)

*Aleas* Defendant(s)Classification Prefix LCode 01Nature of Action LawCode 02

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

Pltf. Atty. Lloyd M. Cuelo

Code \_\_\_\_\_

Address 7110 West Main StreetCity BellevillePhone 277-1554Add. Pltf. Atty. Michael Gras

Code \_\_\_\_\_

NAME Tiltware, LLC

c/o Paracorp Inc.

ADDRESS 2804 Gateway Oaks Drive

Suite 200

CITY & STATE Sacramento, CA 95833

## SUMMONS COPY

To the above named defendant(s).....:



A. You are hereby summoned and required to appear before this court at

(court location) \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_

to answer the complaint in this case, a copy of which is hereto attached. If you fail to do so, a judgment by default may be taken against you for the relief asked in the complaint.



B. You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, in the office of the clerk of this court within 30 days after service of this summons, exclusive of the day of service. If you fail to do so, judgment of decree by default may be taken against you for the relief prayed in the complaint.

## TO THE OFFICER:

This summons must be returned by the officer or other person to whom it was given for service, with indorsement thereon of service and fees if any, immediately after service. In the event that paragraph A of this summons is applicable this summons may not be served less than three days before the day of appearance. If service cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than 30 days after its date.

WITNESS,

*1-29* 20*13*

Clerk of Court

BY DEPUTY:

SEAL

DATE OF SERVICE: \_\_\_\_\_ 20\_\_\_\_\_

(To be inserted by officer on copy left with defendant  
or other person)

NOTICE TO DEFENDANT IN SMALL CLAIMS UNDER \$15,000--SEE REVERSE SIDE

CC-MR-1

I certify that I served this summons on defendants as follows:

(a) - (Individual defendants - personal):

By leaving a copy of the summons and a copy of the complaint with each individual defendant personally as follows:

Name of defendant	Date of service

(b) - (Individual defendants - abode):

By leaving a copy of the summons and a copy of the complaint at the usual place of abode of each individual defendant with a person of his family, of the age of 13 years or upwards, informing that person of the contents of the summons, and also by sending a copy of the summons and of the complaint in a sealed envelope with postage fully prepaid, addressed to each individual defendant at his usual place of abode, as follows:

Name of defendant	Person with whom left	Date of service	Date of mailing

(c) - Corporation defendants):

By leaving a copy of the summons and a copy of the complaint with the registered agent office, or agent of each defendant corporation as follows:

Defendant corporation	Registered agent, officer or agent	Date of service

(d) - (Other service):

SHERIFF'S FEES	
Service and return	\$ _____
Miles	..... \$ _____
Total	..... \$ _____
Sheriff of _____ County	

\_\_\_\_\_, Sheriff of \_\_\_\_\_ County

\_\_\_\_\_, Deputy

**LAW OFFICE OF LLOYD M. CUETO**  
**ATTORNEY AT LAW**

7110 WEST MAIN ST.  
BELLEVILLE, ILLINOIS 62223

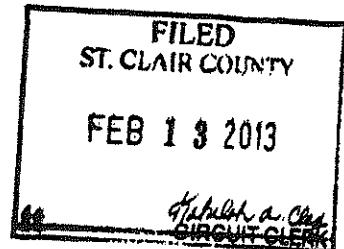
**LLOYD M. CUETO**  
LICENSED IN ILLINOIS & MISSOURI

(618) 277-1554  
FAX (618) 277-0962  
CUETOLM@CUETOLAW.COM

February 11, 2013

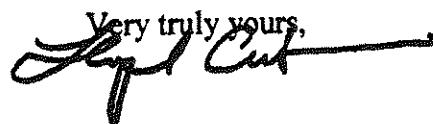
Attention: Civil Division  
Hon. Kahalah Clay  
Clerk of the Circuit Court  
10 Public Square  
Belleville, IL 62220

Re: Fahrner v. Bitar  
No. 12 L 354



Dear Ms. Clay:

Enclosed please find Proof of Service on the Defendant, Tiltware, with regard to the above referenced case.

Very truly yours,  


Lloyd M. Cueto

LMC:lmb  
Enclosure

ST CLAIR COUNTY  
TWENTIETH CIRCUIT COURT, KAHALAH A. DIXON

RECEIPT #: C 000322095 DATE: 02-15-2013 TIME: 14:32:44  
RECEIVED OF: MATHIS MARIFIAN & RICHTER LTD MEMO: 12L354  
PART. ID: 816806 FAHRNER VS BITAR  
BY CLERK: gt SUSPENSE ACCT ID: 000000002  
CHECKS:

CASH	CREDIT	CHANGE	OTHER
\$0.00	\$0.00	\$0.00	\$2.50

CASE NUMBER	EVENT	COURT/JUDGE	TAX NO.	AMOUNT
	2021	PMT:CCOPY COPIES		\$2.50
			TOTAL RECEIPT...	\$2.50

ST CLAIR COUNTY  
TWENTIETH CIRCUIT COURT, KAHALAH A. DIXON

RECEIPT #: C 000322095 DATE: 02-15-2013 TIME: 14:32:44  
RECEIVED OF: MATHIS MARIFIAN & RICHTER LTD MEMO: 12L354  
PART. ID: 816806 FAHRNER VS BITAR  
BY CLERK: gt SUSPENSE ACCT ID: 000000002  
CHECKS:

CASH	CREDIT	CHANGE	OTHER
\$0.00	\$0.00	\$0.00	\$2.50

CASE NUMBER	EVENT	COURT/JUDGE	TAX NO.	AMOUNT
	2021 PMT:CCOPY COPIES			\$2.50
		TOTAL RECEIPT...		\$2.50

**LAW OFFICE OF LLOYD M. CUETO**  
**ATTORNEY AT LAW**

7110 WEST MAIN ST.  
BELLEVILLE, ILLINOIS 62223

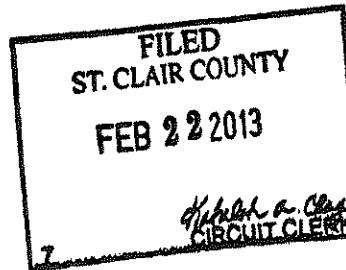
**LLOYD M. CUETO**  
LICENSED IN ILLINOIS & MISSOURI

(618) 277-1554  
FAX (618) 277-0962  
CUETOLM@CUETOLAW.COM

February 20, 2013

Attention: Civil Division  
Hon. Kahalah Clay  
Clerk of the Circuit Court  
10 Public Square  
Belleville, IL 62220

Re: Fahrner v. Bitar  
No. 12 L 354

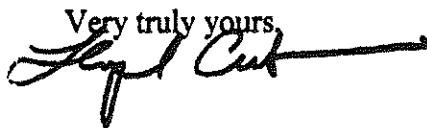


Dear Ms. Clay:

Enclosed please find an Alias Summons on Defendant, Jennifer Harmon-Traniello. I ask that you please issue the Alias Summons as follows and return a copy in the self-addressed stamped envelope enclosed:

Jennifer Harmon-Traniello  
9103 Alta Drive, Apt 1003  
Las Vegas, NV 89145.

Also enclosed please find my firm's check in the amount of \$5.00.

Very truly yours,  


Lloyd M. Cueto

LMC:lmb  
Enclosure

ST CLAIR COUNTY  
TWENTIETH CIRCUIT COURT, KAHALAH A. DIXON

RECEIPT #: C 000322480 DATE: 02-22-2013 TIME: 15:26:34  
RECEIVED OF: CUETO LLOYD M MEMO:  
PART. ID: 726303  
BY CLERK: gt  
CHECKS: A 2111 \$5.00

CASH	CREDIT	CHANGE	OTHER
\$0.00	\$0.00	\$0.00	\$0.00

CASE NUMBER	EVENT	COURT/JUDGE	TAX NO.	AMOUNT
12-L-0354 FAHRNER VS BITAR PARTY: CUETO LLOYD M	2010	PMT:CALSUM ALIAS SUMMONS		\$5.00
		TOTAL RECEIPT...		\$5.00

\* CHECK/CHEQUE IS CONDITIONAL PAYMENT  
\* PENDING RECEIPT OF FUNDS FROM BANK. \*

**MASTER RECORD SHEET  
#171  
CIRCUIT COURT OF ST. CLAIR COUNTY**

Note: Pltf. Atty or Pro Se Pltf. Must Complete Sections 1,2,3,5,&6 Complete 4 if Small Claims Case. Sections 3, 5 & 6 For Office use Only.	Case Number <u>12 L 354</u>
	Amount Claimed <u>\$50,000+</u>

<b>1. Judy Fahrner</b>  VS  <i>Alias</i>  <b>Plaintiff(s)</b>	<b>Raymond Bitar et al.</b>  <b>Defendant(s)</b>
---	--

(SEE REVERSE FOR CLASSIFICATIONS AND CODES)

Classification Prefix <u>L</u>	Code <u>01</u>	Nature of Action <u>Law</u>	Code <u>02</u>
TO THE SHERIFF: SERVE THIS DEFENDANT AT:			
2. Pltf. Atty. <u>Lloyd M. Cueto</u>	Code _____	3. NAME <u>Jennifer Harmon-Taniello</u>	
Address <u>7110 West Main Street</u>		ADDRESS <u>9103 Alta Drive, Apt 1003</u>	
City <u>Belleview</u>	Phone <u>277-1554</u>		
Add. Pltf. Atty. <u>Michael Gras</u>	Code _____	CITY & STATE <u>Las Vegas, NV 89145</u>	
Is Personal Injury Involved			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Does Pltf. Demand A Jury Trial			
<input type="checkbox"/> Yes <input type="checkbox"/> No			
(THIS DOES NOT CONSTITUTE A JURY DEMAND)			

4.  CHECK FOR  
SMALL CLAIMS SUMMONS      Complete This Section For Small Claims

Please Set This Case For \_\_\_\_\_ at \_\_\_\_\_ M. On \_\_\_\_\_ 20\_\_\_\_\_  
Court Location \_\_\_\_\_

5. A. Is an insurance carrier involved?       Yes       No

B. If yes please give company name: \_\_\_\_\_

6. A. Is there a minor involved?       Yes       No

B. If yes, will the appointment of a guardian Ad Litem be necessary       Yes       No

SEE REVERSE FOR  
CASE CLASSIFICATIONS AND CODES



State of Illinois  
IN THE TWENTIETH JUDICIAL CIRCUIT, ST. CLAIR COUNTY, BELLEVILLE, ILLINOIS

PLAINTIFF

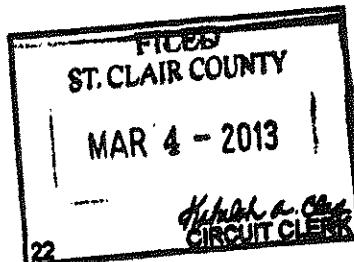
Fahrner

vs.

Bitar et. al.

Defendant

No. 12-L-354



ORDER

This cause coming before the Court; the Court being fully advised in the premises and having jurisdiction of the subject matter;

The Court finds: ~~the Plaintiff advised Court~~

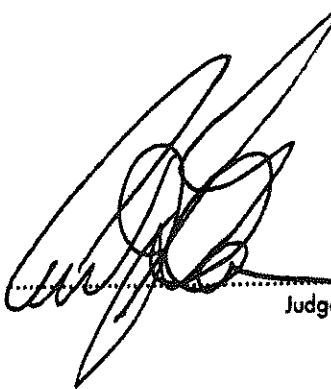
IT IS THEREFORE ORDERED: ~~the~~ Service is in progress  
pursuant to Hague convention procedure.

Above styled cause is reset for status  
conference on 5/13/13 at 9AM in  
Courtroom 401.

Attorneys:

  
Plaintiff

Enter:

  
Judge